

AMSA PharmFree Scorecard Archive – summer of 2008 (June through August)

A.T. Still University College of Osteopathic Medicine - Mesa and Kirksville

Grade **F** This institution responded to the request for policies, but reported only descriptions of policies rather than submitting actual policies to be scored. Subsequent attempts to acquire these policies from the institution have been as of yet unsuccessful. Kirksville campus is covered by Mesa campus policies.

Albany Medical College

Grade **F** This institution has not responded to AMSA's request for policies.

Albert Einstein College of Medicine

Grade **I** This institution has informed us that they are revising or developing new policies.

Arizona College of Osteopathic Medicine

Grade **F** Arizona College of Osteopathic Medicine has declined to participate in the AMSA Pharm-Free Scorecard 2008. This institution may be at least partially governed by broader policies, but has yet to describe the degree of its dependency. If it is clear that an institution cannot set its own policy, it will not be graded as an independent entity.

Baylor College of Medicine

Grade **I** Grade: D Complete policies for this institution are still in development, but certain materials for provisional assessment have been provided, pending final approval. This institution has not provided policies that address potential conflicts due to industry sponsorship of educational events on and off its campus. It has also not limited in any way drug company representative access to its campus and employees and students. The institution has, however, taken steps to reduce inappropriate relationships that faculty may have with industry through disclosure and oversight. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.

Gifts and Meals	1	Gifts are limited to a value of \$100 each, with no maximum aggregate value.
Consulting	3	The employee's supervisor must pre-approve any consulting agreement and the compensation must be appropriate for services the employee provides.
Speaking	2	The employee's supervisor must pre-approve any speaking agreement (covered under consulting) and the compensation must be appropriate for services the employee provides. However the policy places not limit on the longevity of speaking relationships, thus does not address the issue of speakers' bureaus.
Disclosure	2	The institution provides a disclosure statement that covered personnel are required to complete once when beginning work and then periodically when potential conflicts may arise. The statement must also be reviewed annually for any necessary updates.
Samples	1	No policy or policy not provided
Purchasing and Formulary	3	Contracts between the institution and business entities must be negotiated free of self-interest and not by someone who has relations with the business in question. We have interpreted "negotiate" to mean "take part in discussions or vote on formulary decisions" in this case.
Industry Sales Reps	1	No policy or policy not provided
On-Site Educational Activities	1	No policy or policy not provided
Off-Site Educational Activities	1	No policy or policy not provided

Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	The institution has created a Conflict of Interest Committee appointed by the President of the College that is responsible for administering the policies.
Enforcement	Y	Sanctions referenced

Boston University School of Medicine

Grade	B	Covering both the medical school and its affiliated hospital, Boston University School of Medicine has strong policies that seem centered in Brennan et al. These policies could move from strong to exemplary with the addition of – for example – curriculum on this subject matter, and measures to prevent individual physicians from being the first point of receipt for samples from drug reps.
Gifts and Meals	3	All gifts and meals "directly or indirectly funded by industry" are prohibited in the hospital and on campus.
Consulting	2	Consulting relationships are required to be set forth in writing for legitimate, specific services, and are subject to annual disclosure.
Speaking	2	Clinicians with speaking engagements for industry should receive only fair market compensation, and must maintain control over lecture content.
Disclosure	2	Per University policy, annual disclosure of all business/financial relationships is required of all faculty and staff.
Samples	2	All samples must be dispensed through the pharmacy, and use by clinicians, staff, and their family is prohibited.
Purchasing and Formulary	3	"Clinicians who are involved in institutional decision concerning the purchase of or approval of medications or equipment, or the negotiation of other contractual relationships with industry must not have a financial interest in the vendor that might benefit from the institutional decision."
Industry Sales Reps	2	Industry representatives must have an appointment with a clinician, and are banned from all patient-care areas.
On-Site Educational Activities	2	The School of Medicine requires all on-site educational activities, whether ACCME accredited or not, to comply with ACCME standards for commercial support. In addition, meals may not be supported by industry.
Off-Site Educational Activities	3	Clinicians and trainees may not accept funding for travel and related expenses except to "review a vendor's products under circumstances that do not create...a conflict of interest."
Scholarships and Grants	3	Industry may not select recipients of scholarships.
Curriculum	1	No policy, or policy not provided.
Oversight	Y	Department chairs are responsible for enforcing policies, and report to the Chief Medical Officer.
Enforcement N		Sanctions referenced in this policy.

Brown University School of Medicine

Grade	1	Like a number of other medical schools, Brown University School of Medicine does not own its seven affiliated hospitals, each of which establishes its own set of conflicts of interest policies. A short conflicts of interest policy that was provided is applicable to Brown medical school faculty, but it does not address key issues related to pharmaceutical marketing. The School is currently convening a group to address student interactions with industry representatives. This was still the case as of May 23, 2008. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes
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Case Western Reserve University School of Medicine

Grade	1	The institution has indicated it is currently revising its policies.
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Chicago College of Osteopathic Medicine

Grade **F** This institution has not responded to AMSA's request for policies.

Chicago Medical School at Rosalind Franklin University

Grade	D	The thoughtful cover letter regarding medical education policy is pragmatic and reflects a strong policy stance (i.e. not requiring any student to attend any event partially sponsored by industry), but Chicago Medical School is silent on consulting, site access, off-site education, and scholarships. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	1	Gifts are prohibited if they have the effect or appearance of influencing any employee's discretionary authority. This is a subjective limitation, and thus does not substantively reduce gifting.
Consulting	1	Annual disclosure and conflict of interest management is required for consulting relationships > \$10,000 per year. This does not seem to represent a significant regulation of consulting relationships.
Speaking	1	Annual disclosure and conflict of interest management is required for speaking relationships > \$10,000 per year. This does not seem to represent a significant regulation of speaking relationships.
Disclosure	2	Internal disclosure of financial conflicts is required for every employed faculty member. The disclosures will be reviewed by the Conflict of Interest Committee.
Samples	N/A	This institution does not dispense prescription drugs.
Purchasing and Formulary	2	Members of purchasing and procurement committees must disclose all conflicts of interest, but are not necessarily prevented from taking part in decisions pertinent to that conflict.
Industry Sales Reps	N/A	Industry sales representatives do not come to this medical school as they do not prescribe prescription drugs.
On-Site Educational Activities	1	A strong policy was described in the cover letter, but was not seen to be codified in the provided policies.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	The Medical College indicates that there are lectures on COI but that curriculum is directed by faculty and not subject to overarching policies.
Oversight	Y	This policy references oversight.
Enforcement	N	This policy does not reference or imply sanctions.

Columbia University College of Physicians and Surgeons

Grade	B	Generally strong policies are in place at Columbia University College of Physicians and Surgeons. Particularly noteworthy is the College's watchful control of distributed drugs, via both a rigorous ban on samples, and the recusal of individuals with conflicts of interest from purchasing and formulary decisions. Areas that could be strengthened include the gifts policy, which does not currently seem to apply to faculty, and institutional oversight of consulting and speaking relationships. The College is in the process of developing policies governing attendance at off-site educational events, and the receipt of scholarships and funds for trainees. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	The College bans gifts, including promotional items, and meals not delivered through an unrestricted educational grant. However, this policy, which focuses on the conduct of medical sales representatives, does not seem to include faculty in its restrictions.
Consulting	1	Consulting relationships require prior disclosure, but are not subject to prior approval and this policy's limit of one-day-a-week is not meaningful insurance of appropriateness or commensurate compensation.
Speaking	2	A one-in-seven-day limit and prior disclosure are required for speaking relationships.
Disclosure	2	Internal disclosure is required.
Samples	3	The College has implemented an excellent, clear ban of all drug samples, and made explicit reference to accountability.

Purchasing and Formulary	3	The participation of individuals with financial conflicts in purchasing and formulary decisions is defined as not normally allowable. Neither disclosure nor permission are cited as the mechanism to make this allowable; therefore, we read this as a complete ban of individuals with financial conflicts from purchasing and formulary deliberations.
Industry Sales Reps	2	Medical Sales Representatives are required to have appointments, are not allowed in patient care areas, and are prohibited from meeting with students and staff (although not faculty), which establishes good limits on a sales rep's territory while visiting the medical center.
On-Site Educational Activities	2	Checks and unrestricted educational funds must go to the University or Hospital. Industry may not stipulate the content of the educational event.
Off-Site Educational Activities	1	The College has indicated that it is creating new policies to address off-site education. Based on other aspects of the policy, we expect these guidelines will be strong.
Scholarships and Grants	1	The College has indicated that it is creating new policies to address industry support of scholarships and trainee funds. Based on other aspects of the policy, we expect these guidelines will be strong.
Curriculum	1	No policy, or policy not provided.
Oversight	Y	The Joint Standing Committee on Conflict of Interest is given oversight/authority to uphold policies by Dean of Faculty of Medicine and by the Chief Medical Officer.
Enforcement Y		This policy references sanctions for non-compliance.

Creighton University School of Medicine

Grade	D	The conflict of interest policies for this institution do not address most of the domains on which they was assessed, such as consulting, speaking, disclosure, off-site education and purchasing/formulary committees. The institution does have a reasonably strict vendor site access policy and some controls for on-site education. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	2	Gifts and meals to faculty and staff are limited to no more than a total value of \$50 per year and generally limited in nature for educational purposes or patient benefit.
Consulting	1	This policy places no limits on consulting engagements, other than annual disclosure for researchers who earn over \$10,000/year extramurally.
Speaking	1	This policy places no limits on speaking engagements, other than annual disclosure for researchers who earn over \$10,000 extramurally.
Disclosure	1	This disclosure policy, which applies only to researchers, is not comprehensive because of its \$10,000/year floor.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	2	Sales representatives must have an appointment scheduled for access to the campus and are banned from patient care areas.
On-Site Educational Activities	2	All educational activities must adhere to the ACCME Standards for Commercial Support, and there is some central management of funds by the Division of CME to separate sponsors from individual recipients.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	No policy, or policy not provided.
Oversight	N	There is no enforcement or supervisory authority graded beyond the university-wide disclosure requirement.
Enforcement	Y	There are sanctions listed for noncompliance with policies.

Dartmouth Medical School

Grade **F** This institution has not responded to AMSA's request for policies.

Des Moines University College of Osteopathic Medicine

Grade **I** The College is undergoing a policy-revision process, after which it has indicated it will submit policies to be scored.

Drexel University College of Medicine

Grade **D** A substantial portion of this institution's policies are based, nearly word for word, on AMA guidelines, which do not impose substantial restrictions on many aspects of industry interactions. The institution has created policies applicable to students in the domains of gifts and scholarship/funding and a curriculum that are relatively strong.

Gifts and Meals	1	This institution's policy on gifts does not go beyond the AMA guidelines on industry gifts to physicians.
Consulting	1	Policy addresses consulting relationships and provides some guidance, but does not require institutional approval of these relationships or require that they be defined in contracts or that payment be commensurate to the task.
Speaking	1	No policy or policy not provided
Disclosure	2	The institution requires disclosure of all conflicts of interest annually, and more often by faculty and other selected staff.
Samples	1	There are no significant restrictions placed on the distribution or use of samples.
Purchasing and Formulary	N/A	Institution does not purchase prescription medicines
Industry Sales Reps	N/A	Pharmaceutical sales representatives do not visit the institution
On-Site Educational Activities	2	Educational events adhere to ACCME standards
Off-Site Educational Activities	2	The policies allow for acceptance of reimbursement for reasonable expenses associated with off-site educational conferences, but payments for simply attending are not permitted.
Scholarships and Grants	3	Industry may not select the recipient of scholarships or trainee funds to attend educational events.
Curriculum	3	The institution has a curriculum that includes sessions on the roles of the pharmaceutical industry at multiple junctures, and also includes reviews of the advantages and disadvantages of industry presence in a clinical setting.
Oversight	Y	Responsible parties are listed for overseeing portions of the policies.
Enforcement	N	No specific sanctions for noncompliance are listed.

Duke University School of Medicine

Grade **D** This University has submitted a policy that covers only the annual disclosure requirement for faculty and staff and participation in institutional decision-making. The policies provided do not adequately address the other Scorecard domains. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.

Gifts and Meals	1	No policy or policy not provided
Consulting	1	Disclosure required of consulting relationships, but no review or limits placed on such relationships.
Speaking	1	No policy or policy not provided
Disclosure	2	Annual disclosure of all potential conflicts is a requirement of this policy.
Samples	1	No policy or policy not provided
Purchasing and Formulary	3	Individuals with financial conflicts must recuse themselves from purchasing or formulary decisions
Industry Sales Reps	1	No policy or policy not provided

On-Site Educational Activities	1	No policy or policy not provided
Off-Site Educational Activities	1	No policy or policy not provided
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	This policy references oversight.
Enforcement Y		This policy references sanctions.

East Tennessee State University - James H. Quillen College of Medicine

Grade	D	A Graduate Medical Education (GME) policy appears to apply to residents, but not faculty, addresses a number of scorecard domains. Additional disclosure and consulting policies apply to those domains. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	1	GME policies limit gifts to textbooks, modest meals, gifts that benefit patients and gifts under \$100, but this policy appears to apply only to residents and not to faculty. Thus, gifting is not substantially reduced.
Consulting	1	This institution only requires disclosure for significant financial interests (compensation >\$10,000 per year), which are then handled on a case-by-case basis.
Speaking	1	The only policy relating to speaking engagements applies only to residents and requires that honoraria be modest and that travel be pre-approved by the department Chair.
Disclosure	1	The institution requires disclosure of significant financial interests at a minimum, but this is on an as-needed basis, not annually or periodically.
Samples	1	No policy or policy not provided, except the GME policy which expressly permits personal use of samples by physicians and their families.
Purchasing and Formulary	1	No specific policy applicable to participation in P&T decisions beyond the incomplete disclosure required of all.
Industry Sales Reps	1	No policy or policy not provided
On-Site Educational Activities	2	The institution may accept funding from industry to support conference speakers if the money is given to the department and the topics and speaker are chosen by the institution.
Off-Site Educational Activities	1	No policy is provided to cover faculty. GME policy prohibits compensation to residents for attending meetings. Travel support is allowable only if provided to the institution.
Scholarships and Grants	3	The institution may accept funding for trainees to attend educational conferences, but industry may not choose the recipients.
Curriculum	1	No policy or policy not provided
Oversight	Y	There are multiple committees and individuals responsible for overseeing compliance with the disclosure policies.
Enforcement	Y	Sanctions are provided for noncompliance with financial disclosure policies.

Eastern Virginia Medical School

Grade	D	This policy addresses many of the domains, but its vagueness and almost exclusive reliance on weaker guidelines (AMA, PhRMA) fails to take meaningful steps to limit potential industry influence on medical decision-making.
Gifts and Meals	1	Gifts under \$100 "related to professional responsibilities" are discouraged but permitted -- other types of gifts are not mentioned. This policy mirrors the AMA guidelines for gifting, and does not adequately limit gifts from vendors.

Consulting	2	There is no oversight of consulting relationships, but: "[a]n EVMS faculty member may accept only fair market compensation for specific, legitimate services provided by him or her to pharmaceutical companies. Payment must be commensurate with time and effort. The terms of the arrangements, services provided and compensation must be set forth in writing."
Speaking	1	The consulting requirements established here would not limit participation on or compensation for speakers bureaus, for which there is no institutional review.
Disclosure	1	This policy mandates disclosure only for applicants of federal research grants, and has a \$10,000 disclosure floor.
Samples	1	This policy's stipulation that samples may not be sold does not qualify as a significant limit on samples as a marketing tool.
Purchasing and Formulary	N/A	According to the policy submission, Medical School faculty work at hospitals with individual purchasing and formulary decisions.
Industry Sales Reps	1	"Industry representatives are generally discouraged in patient care areas." This policy is weak and permits vendors unrestricted access to the Medical School.
On-Site Educational Activities	2	"All educational activities related to graduate medical education program must be in compliance with the Graduate Medical Education Institutional Requirements and the EVMS Graduate Medical Education Council's policy on Relationships with Entrepreneurial Entities."
Off-Site Educational Activities	2	ACCME standards preventing quid pro quo and requiring department or division heads to select recipients represent some limits on industry support on off-site education, but there are gaps on travel financing, and no explicit exclusion of industry in the awards process.
Scholarships and Grants	3	The Medical School stipulates that scholarship designees will be selected by their medical school department, representing institutional review.
Curriculum 1		The policy submission indicated that the Medical School provides classes on conflict of interest; providing further information about such classes would improve the score.
Oversight	Y	This policy establishes oversight.
Enforcement Y		This policy makes reference to sanctions.

Edward Via Virginia College of Osteopathic Medicine

Grade **F** This institution has declined to participate in AMSA PharmFree Scorecard 2008

Emory University School of Medicine

Grade	1	Grade: C Emory University School of Medicine has indicated that its conflict of interest policies are being reviewed and revised at the present time. As they stand, these policies are strong in samples (a complete ban), site access (by appt. only, and non-patient care areas), and consulting (prior approval and review of all relationships, in writing). No policy was submitted pertaining to on or off-site continuing education, curriculum, industry scholarships, or purchasing and formulary decisions. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	Though the School of Medicine policy cites the notably weak gifts guidelines of the AMA and PhRMA only, the University human resources policy seems to prohibit gifts over \$40, including meals, airline tickets, hotel accommodations, and entertainment.
Consulting	3	The University policy requires faculty members to disclose in advance all consulting agreements, in writing for review and approval. The institution specifically states that this is to ensure no conflicts of interest exist.
Speaking	1	The School of Medicine provides no explicit policy regarding speaking relationships.
Disclosure	2	The School of Medicine requires disclosure of any relationship, event or transaction which may raise a conflict of interest.
Samples	3	Drug samples for patient use are prohibited.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	2	Pharmaceutical representatives must make an appointment and are not permitted in patient care areas.
On-Site Educational Activities	1	No policy, or policy not provided.

Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	No policy, or policy not provided.
Oversight	N	No party named responsible for oversight.
Enforcement	N	No sanctions referenced in this policy.

Florida State University College of Medicine

Grade	B	The policy of Florida State University College of Medicine contains a complete ban on gifts with exemplary language. It also prohibits industry representatives from detailing on-site, and prevents earmarking for industry-funded scholarships. However, the policy is weak on speaking and event attendance, which limit personnel activity only when personnel's employment status is acknowledged. This will not prevent most speaking relationships or the acceptance of honoraria to attend off-site events. Furthermore, the policy provides no guidance on the acceptance of samples, or content overview for on-site educational activities.
Gifts and Meals	3	The College has a complete ban on gifts, and exemplary language concerning on-site meals: "The direct provision of any meals, desserts, etc. by pharmaceutical/ industry representatives on [university] property is prohibited. This includes the provision of meals during any organized, scheduled educational activity (e.g., grand rounds, journal club, faculty development, etc.) or reception. Industry representatives who wish to provide support to the [university] may, however, do so in the form of an unrestricted educational grant to the [university]. Such grants are expended for food solely at the discretion of [university] departments/ divisions/ regional campuses/ residency programs."
Consulting	1	This policy contains no specific requirements regarding approval or contracts for consulting relationships. Consultants must disclose their relationships before participating in decisions product/device decisions, but there is no further mention of such relationships.
Speaking	1	The policy language on speaking relationships is ethically commendable, but may not be sufficiently rigorous in practice. Honoraria furnished by industry are prohibited when the recipient's status as College of Medicine personnel is acknowledged. Such a provision provides an easy workaround for personnel to engage in speaking relationships without oversight or constraint, and therefore does not safeguard integrity of content or prevent participation in long-term engagements such as speakers bureaus.
Disclosure	2	Annual disclosure to Personnel office is mandated, but without stipulation for patient or public notification.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	2	This policy does not prohibit individuals with external financial relationships from participating in purchasing decisions concerning the company with which they are involved, but it does stipulate that committee heads must decide whether the conflicted individual must recuse her/himself from the decision.
Industry Sales Reps	3	This policy refers to detailing twice: first in the preamble of the policy, and then in a separate Site Access section which establishes a clear ban on industry sales representatives.
On-Site Educational Activities	1	Although the policy stipulates that scholarships for students must go to a central fund, no similar limit exists for general educational grants applicable faculty, staff and trainees. Thus, funds for on-site educational activities may not be adequately restricted.
Off-Site Educational Activities	2	This policy suffers from the same non-rigorous language as discussed under speaking relationships. The policy bans receipt of funds defraying costs of simply attending events, but allows the acceptance of industry honoraria, provided an individual's employment status is not acknowledged.
Scholarships and Grants	3	Grants may not be given directly to individuals, and all funds should be directed to the College of Medicine. This strong policy prevents "earmarking" and provides oversight.
Curriculum	3	An excellent policy. Along with providing guidelines, this policy states that seminars and faculty development sessions will cover: <ul style="list-style-type: none"> • "How activities can influence judgment in prescribing decisions and research activities. How to manage encounters with Industry representatives. • How to handle patient requests for medication, particularly regarding direct-to-consumer advertising of drugs. • The purpose, development, and application of drug formularies and clinical guidelines and discussing such issues as branding, generic drugs, off-label use, and use of free samples."

Oversight	Y	The College of Medicine establishes clear responsibility for oversight: "administration, department heads, division heads, campus deans, program directors, etc. are responsible for compliance with this policy and for ensuring the personnel under their supervision understand and comply with this policy."
Enforcement	N	This policy does not refer to sanctions.

George Washington University School of Medicine

Grade		This institution submitted a response to the AMSA Pharm-Free Scorecard. Unfortunately, the response was lost in the mail. AMSA has re-requested a response, and will assess this institution as soon as that response is received.
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Georgetown University School of Medicine

Grade		Grade: D An ad-hoc committee has been convened to create overarching policies at this institution. The current Georgetown policy is strong on regulating industry-provided scholarships, and scores in policy areas such as gifts could be easily elevated with small language changes, such as express inclusion of meals and non-monetary gifts. NB: The institution referred to - but did not provide - a restrictive vendor-access policy. The inclusion of such a policy would elevate this institution's score. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	The GU School of Medicine restricts house staff from accepting any monetary grant or gift from a vendor or their representative, but sets no non-monetary gifting limits or bans for faculty.
Consulting	1	Only consulting relationships over \$10,000/year are subject to disclosure; no other limits on quality or provisions of such relationships exist.
Speaking	1	Only speaking relationships over \$10,000/year are subject to disclosure; no other limits on quality or provisions of such relationships exist.
Disclosure	2	Internal disclosure of financial conflicts is required for staff at entry, and then annual disclosure is required thereafter. Confidentiality is ensured.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	2	Faculty and staff in consulting relationships must recuse themselves from purchasing/ formulary decisions only when their contract with industry is worth more than \$10,000/year. This does not prevent individuals with less lucrative contracts or other types of potential conflicts from participating in purchasing decisions.
Industry Sales Reps	1	The School of Medicine noted in its policy submission that industry representatives are not allowed access to the School of Medicine, but no policy was provided to substantiate this claim.
On-Site Educational Activities	2	This policy only outlines limitations for Graduate Medical Education; broader CME regulations are not discussed.
Off-Site Educational Activities	1	This policy does not address industry support of off-site events for faculty or house staff.
Scholarships and Grants	3	The Office of Graduate Medical Education does not endorse or support resident interaction with vendors and their representatives, but accepts unrestricted grants for medical education, which must be vetted and approved through the office of the Vice President of Medical Affairs, and delineated in a contract. In combination with the School of Medicine gifts policy, this section effectively establishes departmental control over scholarships and trainee funds.
Curriculum	1	No information on curriculum provided in policy.
Oversight	Y	
Enforcement	Y	

Harvard Medical School

Grade **F** Harvard, like many medical schools, does not own its affiliated hospital. The institution reported that a University-wide review of conflict of interest standards is underway, but we were unable to clarify whether the review would address medicine-specific issues. While noting that the Harvard-affiliated hospitals are currently reviewing relevant policies, the medical school itself reported that it currently has no COI policies corresponding to the Scorecard domains.

Howard University College of Medicine

Grade **F** This institution has not responded to AMSA's request for policies.

Indiana University School of Medicine

Grade **I** This institution has indicated it is in the process of developing policies.

Johns Hopkins School of Medicine

Grade **D** This institution has a strong annual disclosure requirement, but its policies on gifts, consulting, and speaking are less stringent, as is its language on continuing medical education, site access, and scholarships. Curriculum and formulary, while addressed in the cover letter of the submission, seem to be missing from the policies themselves. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.

Gifts and Meals	2	This policy limits gifts to those for direct patient use and/or educational benefit to the physician. Modest meals are allowed.
Consulting	2	A written agreement for prior review by the School of Medicine is required for all ongoing external relationships. However, this COI policy does not require all consulting relationships to be established in a formal contract with the payer.
Speaking	2	Though isolated speaking engagements are exempt from prior institutional review, the clause requiring repetitive engagements to be disclosed would seem to exact some review and perhaps limit on long-term speaking relationships.
Disclosure	2	Clear annual and ongoing disclosure required of all faculty, staff, trainees, and students.
Samples	1	This School of Medicine's drug samples policy is merely procedural and would not curb the use of samples as a marketing tool at the institution.
Purchasing and Formulary	2	Disclosure required. Annual disclosure requirement would apply to those serving on P & T and other purchasing committees.
Industry Sales Reps	2	This site access policy imposes some limits on detailers, who must have an appt. booked three days in advance of visiting the hospital. Despite this limit, this policy is weaker than many AMC site access policies because it permits detailers to access patient care areas of the hospital.
On-Site Educational Activities	1	Though adherence to ACCME standards for commercial support for some activities is indicated in cover letter, no correlating policy was provided.
Off-Site Educational Activities	1	As it stands, the policy does not seem to address off-site education. If gifting limits apply, this must be codified in the policy.
Scholarships and Grants	1	The cover letter indicates that scholarships may have "no quid pro quo," but no policy was provided to confirm this.
Curriculum	1	Cover sheet indicates faculty must take an online COI course and a research ethics course, but this is not codified within provided policy.
Oversight	Y	This policy makes reference to oversight.
Enforcement	Y	This policy makes reference to sanctions.

Kansas City University of Medicine and Biosciences - College of Osteopathic Medicine

Grade **F** This institution has indicated it does not possess policies relevant to the assessed scorecard domains.

Keck School of Medicine of the University of Southern California

Grade		Grade: D Complete policies are still in formation, but this institution has provided certain materials for provisional assessment while they await final approval. This policy has strong off-site education and scholarship policies, but is less stringent in the areas of disclosure, samples, site access, and pharmacy and therapeutics conflicts. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	2	This gifts policy is more stringent than PhRMA code with a \$50 limit per gift, but is not sufficient to effectively curb all industry marketing.
Consulting	2	Consultants must obtain a written contract with specific deliverables and accept only fair-market compensation for services rendered.
Speaking	1	This policy explicitly allows faculty to present at industry-sponsored events where the clear purpose is to market the company's product. The policy suggests the provider consider whether that compromises his/her best clinical judgment.
Disclosure	1	Disclosure is required only for speaking and publications.
Samples	1	Admonitions not to sell samples or let them influence clinicians' decision-making does not constitute a meaningful restriction on samples as marketing tools.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	1	No policy, or policy not provided.
On-Site Educational Activities	2	Educational events funded by industry must comply with ACCME standards for commercial support, whether or not the program is accredited.
Off-Site Educational Activities	2	Compensation and defraying of costs for offsite educational events is prohibited, but industry funded meals and entertainment are permitted at off-site educational events.
Scholarships and Grants	3	Individuals receiving industry-provided funds must be selected by the institution.
Curriculum	2	This site is participating in an AMA-sponsored Sound Prescribing curriculum series, but it is unclear from what has been provided whether this is a comprehensive component of the curriculum or a pilot program among a more limited cohort of students and trainees.
Oversight	N	No oversight or responsible party specified in this policy.
Enforcement Y		Sanctions referenced in this policy.

Lake Erie College of Osteopathic Medicine

Grade	F	This institution has not responded to AMSA's request for policies.
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Lincoln Memorial University – DeBusk College of Osteopathic Medicine

Grade		This institution has informed us that they are revising or developing new policies.
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Loma Linda University Adventist Health Sciences Center

Grade		Loma Linda University Adventist Health Sciences Center has indicated its policies are under review.
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Louisiana State University School of Medicine - New Orleans

Grade	F	This institution has not responded to AMSA's request for policies.
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Louisiana State University School of Medicine - Shreveport

Grade	F	This institution responded to the request for policies by noting they had no policies for any of the assessed domains
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Loyola University of Chicago Stritch School of Medicine

Grade		
	D	Prior supervisory approval of relationships with industry and annual disclosure are highlights of Loyola Stritch School of Medicine's policy, but at times such prior approval stands in for more substantial limits on industry influence. Policies on purchasing, scholarship provision, and curriculum development are absent from current guidelines. Oversight is excellent. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	The School of Medicine adheres to PhRMA guidelines for educational and practice-related gifts (capping value of each at \$100 or less) but also stipulates that faculty, staff, and students may only receive a maximum of \$50/year worth of gifts -- including pens, notepads, etc. In addition, all gifts must be disclosed in an annual disclosure form, which may substantially reduce willingness to accept Vendor gifts.
Consulting	3	The School of Medicine requires prior supervisory approval and written contracts for all consulting relationships between Colleagues and Vendors.
Speaking	2	The School of Medicine does not prohibit speakers' bureaus or limit their longevity, but does require all such arrangements to have prior supervisory approval and be 'limited' in frequency.
Disclosure	2	The School of Medicine's annual disclosure form is clear, simple to fill out, and inclusive of all types of financial conflicts, including all gifts and entertainment. Still, it's unclear to whom this information is disclosed. The strongest policy will mandate public disclosure.
Samples	1	Samples are permitted to be given to individuals for patient use.
Purchasing and Formulary	1	Annual disclosure required, but no specific mention of how these disclosures will be assessed in relation to serving on formulary committees, etc.
Industry Sales Reps	2	Vendor access is by appointment only, and only in non-patient care areas.
On-Site Educational Activities	2	This policy states that Vendors may not give funds directly to an individual, but the lack of a central fund weakens the firewall between industry funding and on-site educational events.
Off-Site Educational Activities	2	This policy allows Vendors to underwrite travel and off-site event expenses, provided attendee receives prior institutional approval. Recreation/entertainment costs provided by Vendor to attendee may not exceed \$50/person.
Scholarships and Grants	1	The School of Medicine's policies did not substantively address industry support of scholarships or funds for trainees.
Curriculum	1	Nothing in the vendor relations policy pertains explicitly to the content or scope of medical school education.
Oversight	Y	Excellent language establishes those responsible for oversight and compliance in each section of policy.
Enforcement	N	No reference to sanctions is made.

Marshall University Joan C. Edwards School of Medicine

Grade		
	F	Only CME guidelines were submitted by Marshall University Joan C. Edwards School of Medicine, which appear to be a form of ACCME standards for commercial support, and the AMA handbook on gifts, though it is not clear whether this is mandated or suggested policy.
Gifts and Meals	1	No policy provided. The School of Medicine enclosed the AMA Handbook, but unclear whether these guidelines have been codified.
Consulting	1	Consulting is discussed only in disclosure policy.
Speaking	1	Speaking relationships are covered only in disclosure policy.
Disclosure 1		Disclosure measures are referenced only for CME-related work (see speaking and consulting); no policy requiring general disclosure.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	1	The policy concerning recusal of individuals with conflicts from planning CME activities does not apply to purchasing and formulary committees.
Industry Sales Reps	1	No policy, or policy not provided.
On-Site Educational Activities	1	Provided policy applies only to ACCME accredited events.

Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	The submitted form concerning CME content does not constitute medical school curriculum.
Oversight	N	No policy, or policy not provided.
Enforcement	N	No policy, or policy not provided.

Mayo Medical School - College of Medicine

Grade	D	An excellent ban on gifts and on-site meals is complemented by an equally strong policy on external speaking relationships. However the institution did not supply a policy on pharmaceutical samples, nor does there seem to be a disclosure policy for all faculty and staff, only those with consulting income over a certain threshold. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	3	Gifts, food and promotional items may not be accepted by staff.
Consulting	2	The institution requires that pay be commensurate with services provided and reasonable. Consulting engagements for which the faculty member receives compensation above a certain threshold require institutional approval.
Speaking	3	This institution's consulting policy clearly prevents employees from serving as marketing or promotional spokespersons for device or pharmaceutical companies.
Disclosure	1	The institution requires disclosure for those receiving above a certain threshold in consulting fees, but there is no annual disclosure requirement that applies to all employees.
Samples	1	No policy or policy not provided
Purchasing and Formulary	1	The institution does not have requirements for those who serve on purchasing committees, but does outline in detail the potential for conflicts of interest within such committees and provides possible solutions, including full disclosure and recusal.
Industry Sales Reps	2	The institution has created a rigorous training, registration and monitoring system for sales representatives wishing to work on the campus.
On-Site Educational Activities	2	The policy for onsite continuing medical education cites ACCME guidelines.
Off-Site Educational Activities	3	The institution does not permit industry funding to offset travel expenses for employees.
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	There is a Conflict of Interest Oversight Committee
Enforcement Y		Sanctions are listed

Medical College of Georgia School of Medicine

Grade	F	Medical College of Georgia School of Medicine has declined to participate in AMSA Pharm-Free Scorecard 2008.
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Medical College of Wisconsin

Grade	I	Grade: C The Medical College of Wisconsin has indicated its policies are currently under review. As of May 23, 2008, these draft policies were reported close to approval. The College has comprehensive, although private, disclosure provisions. It also prohibits industry representatives from soliciting on-campus, which is commendable. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	Policy language seems to prevent large or conspicuous gifts, but allows smaller ones. Gifts with an arguable educational or patient-benefit purpose such as branded diagrams or prescription pads are permitted under this policy, yet may still influence physician behavior.

Consulting	1	The only restriction this policy places on consulting relationships is disclosure. Stronger policies would include prior institutional review and provision of a formal, written contract.
Speaking	2	This policy does seem to prevent participation in speakers bureaus by prohibiting the provision of services on demand as de facto employment. It also bans endorsing or marketing a specific product. However, there is no provision that prevents industry from controlling presentation content.
Disclosure	2	This policy sets forth a good, structured annual reporting system, which requires new financial conflicts of interest to be reported as they arise. Nevertheless, this policy includes no mention of the disclosure destination, and thus it is assumed private, not public.
Samples	1	Samples are allowed to be given to doctors and patients without meaningful restriction. The only ban on samples is understood as a provision to disallow their personal use by doctors. This does not mitigate the effects of samples on prescriber behavior.
Purchasing and Formulary	2	While there is not a policy specifically dedicated to Institution decision-makers, general disclosure applies.
Industry Sales Reps	3	On-site solicitation is prohibited.
On-Site Educational Activities	1	No policy, or policy not provided.
Off-Site Educational Activities	1	This policy does not prevent personnel from accepting compensation (either direct or in-kind) for attendance at off-site meetings or events.
Scholarships and Grants	1	This policy does not prevent industry from providing scholarships and other funds directly to trainees, without institutional oversight or control of award recipient.
Curriculum	1	No policy, or policy not provided.
Oversight	N	No overarching policy on oversight.
Enforcement	N	No reference to sanctions.


Medical University of South Carolina

Grade  This institution indicates its policies are being revised.


Meharry Medical College

Grade  This institution has not responded to AMSA's request for policies.

Mercer University School of Medicine

Grade  This institution has informed us on June 11th, 2008, that they are revising or developing new policies.

Michigan State University College of Human Medicine

Grade  On June 4th 2008 This institution indicated they were currently revising their policies. Original Comments: This institution responded to the request for policies, but reported only descriptions of policies rather than submitting actual policies to be scored. Subsequent attempts to acquire these policies from the institution have been as of yet unsuccessful.

Michigan State University College of Osteopathic Medicine

Grade  Michigan State University College of Osteopathic Medicine does not have any college-specific policies for its students, but indicated it adheres to the policies of Michigan State University College of Human Medicine. Michigan State University College of Human Medicine responded to the request for policies, but reported only descriptions of policies rather than submitting actual policies to be scored. Attempts to acquire policies from the institution have been as of yet unsuccessful.

Miller School of Medicine, University of Miami

Grade		
	B	The Miller School of Medicine at the University of Miami has strong, clearly organized policies on individual conflicts of interest. These policies could be made stronger with a complete ban on gifts, tighter restrictions on samples, and a stronger firewall between industry funding and on-site educational activities. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	The School of Medicine's limits on meals may not significantly curb on-site or off-site (restaurant) meals. Provisions to be occasional, informational, and 'modest by local standards' are not significant disincentives for meals.
Consulting	3	Exemplary language. This policy requires a formal contract for all consulting relationships, including the nature of services to be rendered and the amount of compensation for those services, which must be reasonable. Importantly, all such arrangements must be approved by the department chair of the dean.
Speaking	2	Although this policy does not address long-term speaking relationships (in fact it expressly allows participation in speakers' bureaus), it is otherwise very strong. The policy requires institutional review and endorsement of all contracts, and asserts that presentation content must be determined solely by the speaker.
Disclosure	2	Although it was not provided, the School of Medicine refers to a policy for general disclosure of all conflicts of interest or activities that could be perceived as conflicts of interest. There is no provision for public disclosure of these relationships, however.
Samples	2	Samples are allowed, but must be requested formally by the practitioner interested in receiving them. The manufacturer is then issued a permit to distribute requested samples. This emphasis on practitioner initiative would seem to be a limiting factor on the presence of samples in the institution. The policy also states that in hospital settings, sample distribution occurs under the direction of School of Medicine pharmacies.
Purchasing and Formulary	3	A strong policy which requires employees to recuse themselves from purchasing decisions when either they or a close relation (family member, partner, close personal friend) have a financial interest in the business being considered. However, the policy does allow these same individuals to contribute to discussions surrounding the decision (without taking part in the actual vote), which risks undue influence on the outcome.
Industry Sales Reps	2	Industry representatives are allowed on-site, but by appointment only and not in patient-care areas.
On-Site Educational Activities	2	The School of Medicine has taken an important first step in decoupling industry support from the individual recipients (facilitators, practitioners) but has not established a complete firewall, such as a central fund, to ensure all CME activities are spared undue industry influence.
Off-Site Educational Activities	3	The School of Medicine uses model language to prohibit industry support for off-site educational events and conferences, banning industry support (for travel, lodging and other expenses for non-speakers) both directly to the individual and via the conference sponsor.
Scholarships and Grants	3	This policy regulates industry support for scholarships and trainees without inhibiting the opportunity for general educational support. Selection of recipients must be by the institution, and all funds must be given to the department, not directly to individuals.
Curriculum	1	The School of Medicine notes that curriculum development is in process.
Oversight	Y	Clear, model language is used to designate oversight, placing responsibility with department chairs.
Enforcement	Y	Brief but clear hierarchical sanctions laid out for practitioners and staff who violate institutional policy including reprimands, salary fines, and termination.

Morehouse School of Medicine

Grade		
	F	This institution has not responded to AMSA's request for policies.

Mount Sinai School of Medicine

Grade	A	A complete ban on gifts and strong policies on purchasing decisions and pharmaceutical samples set the policies on industry interactions at Mount Sinai School of Medicine apart. The institution's rigorous oversight of external speaking and consulting relationships is noteworthy, as each must be reviewed and approved prior to commencement. If preventive language on long-term speaking relationships were added (to clarify what may already be procedurally true through the oversight process) this policy would be even stronger. Additionally, public disclosure of financial relationships with industry would go even further to promote transparency. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	3	This is an exemplary policy that defines gifts, bans their receipt by faculty, staff and trainees, and removes ambiguity by providing specific examples of many types of gifts.
Consulting	3	Mount Sinai SOM has a separate policy governing financial arrangements with extramural entities that clearly outlines the circumstances under which such relationships are permitted. Importantly, the AMC must also approve all such relationships.
Speaking	2	Although this policy does not prevent long-term speaking relationships, in all other areas it is exemplary. Speaking relationships must be approved by the institution, and presentation content must reflect the faculty member's own work. This policy also explicitly acknowledges the potential for speaking relationships to act as a vehicle for industry promotion.
Disclosure	2	This policy does not provide for public or patient disclosure of faculty financial relationships, but it does require annual filing of conflict of interest statements by those serving on committees making purchasing decisions and those with financial relationships with extramural entities.
Samples	3	Samples are only allowed for specific exceptions that exist for patient benefit: <ol style="list-style-type: none"> 1. For a health emergency and 2. For a necessary product evaluation.
Purchasing and Formulary	3	Exemplary policy. Individuals may not take part in decisions or discussions wherein they have a financial conflict with the company in question or a competitor of that company.
Industry Sales Reps	2	This policy refers to a "Medical Sales Representatives policy" that was not provided. The score is based on the Education and Training on Vendor's Own Products section of the policy, which states that Industry representatives are allowed on site with appointment.
On-Site Educational Activities	2	While contributions for most educational events must be made to a centralized, independent general fund, Mount Sinai SOM does allow non-centralized sponsorship of individual CME-credit-granting educational programs when they apply to offer such programs with Mount Sinai SOM and adhere to Standards for Commercial Support of the Accreditation Council for Continuing Medical Education (ACCME).
Off-Site Educational Activities	3	This policy explicitly warns of the potential bias in educational events, including speakers' bureaus, but allows vendor support for off-site educational events as long as donations are unrestricted and made to a departmental education fund and industry may not select the recipients.
Scholarships and Grants	3	Industry may not choose the recipient of support for educational events.
Curriculum	1	Policy or curriculum description not provided.
Oversight	N	Policy or curriculum description not provided.
Enforcement	N	There is no reference to sanctions.

New York College of Osteopathic Medicine of the New York Institute of Technology

Grade	F	This institution has not responded to AMSA's request for policies.
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New York Medical College

Grade	D	New York Medical College lacks policy language in many scorecard domains. While the institution has strong (although internal) provisions for disclosure, there are no policies to guide consulting or speaking relationships, nor has the institution provided any substantive policy on educational activities, either on- or off-site. The institution has not provided a policy on samples, and did not indicate whether this domain is applicable (whether the institution does or does not dispense prescription drugs). This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	New York Medical College prohibits faculty from accepting gifts and gratuities of more than nominal value from vendors and those known to do business with the College.
Consulting	1	This policy does not contain any specific language pertaining to outside consulting with industry beyond requiring consent before one uses his/her association with the institution for advertising or endorsement purposes.
Speaking	1	This policy does not contain any specific language pertaining to speaking engagements beyond requiring consent before one uses his/her association with the institution for advertising or endorsement purposes.
Disclosure	2	There is a mandatory requirement for annual written disclosure of potential conflicts of interest, as well as a continuing obligation to disclose new conflicts of interest as they arise.
Samples	1	The College provided no information on whether it distributes samples, and its policies contain no portions that are applicable to samples.
Purchasing and Formulary	3	This policy prevents individuals with an external financial interest in a organization from taking part in transactions involving that organization.
Industry Sales Reps	1	The provided policies contain no restrictions on industry representative site access.
On-Site Educational Activities	1	The College provided no policies that apply to on-site educational activities.
Off-Site Educational Activities	1	The College provided no policies that apply to off-site educational activities.
Scholarships and Grants	1	The College provided no policies that apply to scholarship or trainee funds.
Curriculum	1	The College provided no curriculum or statement on its curriculum.
Oversight	Y	This policy provides for a committee be appointed to serve as a reviewing body in the event of policy violations.
Enforcement	N	This policy does not outline any specific sanctions for violations of the policy beyond indicating an identified conflict will be prohibited or modified.

New York University School of Medicine

Grade	 	Grade: B This AMC, which submitted several medical center/sub-center policies, indicates that it is working on a singular unifying 'compendium policy' to be completed by September 2008. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	2	While medical center individuals or employees may not accept a gift from a vendor or patient, including cash, meals, promotional items, honoraria, the policy language implies that non-branded small gifts, as well as educational gifts or gifts directed to patients would not be prohibited.
Consulting	2	Though the Child Center has banned all staff from serving as industry consultants, this provision has not been extended to other faculty and staff, for whom prior approval of such relationships is not required. Should the Child Center be adopted institution-wide, it would receive a top score.
Speaking	2	Though the Child Center has banned all staff from serving on industry speakers bureaus, this provision has not been extended to the AMC faculty and staff at large, for whom prior approval of such relationships is not required. Should the strength of the Child Center speakers ban be reflected in the policies currently in development for the entire institution, it would receive a top score.

Disclosure	2	Annual disclosure of all financial and material interests is required of all medical center personnel and volunteers. (To achieve a top score, such disclosures must be public.)
Samples	2	Though the medical center does not yet have a system-wide policy on samples, a complete ban on samples in the 'Child Study Center' department is encouraging.
Purchasing and Formulary	3	All employees are barred from selecting, awarding, or administering contracts with parties in which they have material interest.
Industry Sales Reps	2	Though there is no institution-wide policy on site access for industry representatives, the Child Center policy bans detailers from speaking with members of the staff. We'd encourage a similarly strong site access component for the rest of the institution.
On-Site Educational Activities	2	Funds for educational conferences allowed as long as institution retains control of content, faculty, etc and the funds do not go directly to an individual.
Off-Site Educational Activities	3	Payment for attendance of off-site ed events is prohibited, and selection of award recipients must be made by the institution.
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	This policy references oversight.
Enforcement Y		This policy references sanctions.

Northeastern Ohio University College of Medicine

Grade **F** Northeastern Ohio University College of Medicine has declined to participate in AMSA Pharm-Free Scorecard 2008.

Northwestern University Feinberg School of Medicine

Grade **I** The institution has indicated that policies are in development.

Nova Southeastern University College of Osteopathic Medicine

Grade **F** This institution responded to the request for policies by noting they had no policies for any of the assessed domains.

Ohio State University College of Medicine

Grade **I** Grade: D This institution has informed us that they are revising or developing their policies. However they have provided material for review. This institution has produced weak policies in most of the domains scored. While it has created a set of policies that cover most of the domains on which it was assessed, the policies are unlikely to limit industry influence at the school. This institution has not consented to allow portions of their policy be cited for illustrative purposes.

Gifts and Meals	1	The gifts and meals policies provided by the institution are generally inline with, but no stronger than, the AMA 2002 guidelines.
Consulting	1	The institution does not require permission for outside consulting performed outside of the staff member's designated work time.
Speaking	1	The institution does not require permission for outside consulting performed outside of the staff member's designated work time.
Disclosure	2	Staff members engaging in paid outside activities must complete the Staff Extramural Activity Reporting Form in the case that the work may present a potential conflict of interest.
Samples	1	No policy or policy not provided
Purchasing and Formulary	2	Committee members are required to disclose in the general institutional policy
Industry Sales Reps	2	Sales representatives are restricted to appointment only visits and have limited access to patient care areas and patients.
On-Site Educational Activities	2	CME sponsorship is permissible so long as the institution retains control over the content of the program.
Off-Site Educational Activities	1	No policy or policy not provided

Scholarships and Grants	3	The institution must choose the recipient of any scholarship funding from industry.
Curriculum 1		The institution has indicated in written correspondence that its online CME curriculum addresses conflicts of interest and pharmaceutical marketing concerns, however codified educational requirements or materials/curriculum of such required courses must be provided for credit to be given.
Oversight	N	The institution does not assign the responsibility of active oversight of the policies to any particular group or individual.
Enforcement	N	The institution lists no specific sanctions for non-compliance.

Ohio University – College of Osteopathic Medicine

Grade | This institution has indicated they are in-process

Oklahoma State University Center for Health Sciences – College of Osteopathic Medicine

Grade F This institution has indicated that it does not currently have policies relevant to the scorecard, but has indicated it will prompt the incoming Associate Dean of Student Affairs to examine these issues. As of May 30, 2008, OSUHSC-COM has not made an institutional decision to embark on policy development.

Oregon Health & Science University School of Medicine

Grade	 	Grade: B This institution has informed us that they are revising or developing their policies. However they have provided material for review. This institution has strong gifts and samples policies, as well as a strong annual disclosure policy that applies to all full-, part-time, and affiliated staff, but weaker firewalls in place for industry support of on- and off-site education. An absence of purchasing/formulary policy or curricular content lowers this institution's score.
Gifts and Meals	2	Due to a recent revision in state ethics law, this institution has indicated it is in process of developing what will likely be a complete gift ban. In the interim, the policy substantially limits gifting, and when notified of final version, AMSA will assess accordingly.
Consulting	2	Prior institutional approval is required, but no limits on payment are established, and explicit reference to the possibility of 'oral agreements' seems to rule out any requirement for a formal contract.
Speaking	1	Speaking relationships are exempted from prior institutional approval.
Disclosure	2	Annual disclosure for all full- or part-time employees is required under policy no. 10-01-015 and policy no. 10-01-021 Conflicts of Interest and Commitment.
Samples	3	"...staff are prohibited from receiving and accepting supplies of sample medications from pharmaceutical representatives for redistribution or dispensing with the single exception of the Casey Eye Institute Ambulatory Surgery."
Purchasing and Formulary	2	Conflicts on purchasing must be disclosed per center-wide disclosure policy; recusal of individuals from specific decisions is a 'management option. The institution indicates it is developing a more specific purchasing/formulary policy.
Industry Sales Reps	2	Appointment required for all sales representatives on campus, but reps are allowed in some patient-care areas accompanied by a staff member of the institution.
On-Site Educational Activities	2	According to policy no 10-01-030, "Sponsorship or underwriting" of education courses on or for the institution "may be accepted so long as: 3) Responsibility for and control over the selection of content, faculty, and educational methods and materials belongs to [the institution]."
Off-Site Educational Activities	1	Policy 10-01-030 stipulates that a student or employee may use industry support for off-site continuing education as long as the institution selects the employee or student who will attend, but no independence from industry, required accreditation, or firewall between donor and recipient are established here.
Scholarships and Grants	1	No specific language applies to industry support of scholarships/trainees.
Curriculum	3	Coursework on pharmaceutical marketing and impact on the medical profession occurs in the second year. The goals of the course are to familiarize students with industry marketing strategies and prepare them for interaction with sales representatives.
Oversight	Y	Integrity office responsible for implementation and compliance.

Enforcement Y Sanctions: "may result in loss of privileges, disciplinary actions, termination of relationship ..." with the institution.

Pennsylvania State University College of Medicine

Grade	Y	Grade: D This institution has informed us that they are revising or developing their policies. However they have provided a working draft for review. This institution has proposed an impressive gifts policy, while failing to address other domains. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	3	The institution has banned all gifts and industry-sponsored meals, as well as requiring that branded items not be displayed in clinical and teaching areas.
Consulting	1	No real restrictions on consulting, although through example they make it clear they do not condone "sham consulting"
Speaking	1	The institution discourages participation in speakers' bureaus and requires that an employee notify his/her department Chair of participation in industry speaking engagements. However, notification is not a restriction
Disclosure	1	There is no policy requiring disclosure by all those who have a potential conflict of interest.
Samples	1	The institution is working on the issue of samples and has made it a priority. They are looking closely at many progressive sample medication systems and intend to implement a new policy.
Purchasing and Formulary	2	The policy states that committee members may not have conflicts of interest. However the institution does not mandate recusal, but simply suggests full disclosure. The policy is not clear that individuals with conflicts must not participate in related decisions.
Industry Sales Reps	2	Sales representatives may only contact staff by appointment.
On-Site Educational Activities	2	All industry supported educational events must comply with ACCME standards.
Off-Site Educational Activities	3	Industry support for off-site education is permissible as long as it passes through the institution as an unrestricted grant and recipients are selected by the institution.
Scholarships and Grants	1	Language regulating scholarship funds from industry was not provided, except for a "no quid pro quo" stipulation.
Curriculum	1	No policy or policy not provided
Oversight N		Oversight not stipulated
Enforcement	N	Sanctions not referenced

Philadelphia College of Osteopathic Medicine

Grade **F** This institution has declined to participate in AMSA PharmFree Scorecard 2008. The Georgia campus is covered by PCOM policies.

Pikeville College - School of Osteopathic Medicine

Grade **F** This institution responded to the request for policies by noting it had no policies for any of the assessed domains.

Ponce School of Medicine

Grade **F** This institution has not responded to AMSA's request for policies.

Rocky Vista University College of Osteopathic Medicine

Grade **F** Rocky Vista University College of Osteopathic Medicine has declined to participate in AMSA Pharm-Free Scorecard 2008.

Rush Medical College

Grade **I** This institution has informed us that they are revising or developing new policies.

Saint Louis University School of Medicine

Grade **I** The institution has indicated its policies are in-process.

San Juan Bautista School Of Medicine

Grade **F** This institution has not responded to AMSA's request for policies.

Southern Illinois University School of Medicine

Grade **D** Southern Illinois University School of Medicine's policies target the most significant conflicts of interest related to industry marketing. But while the Task Force on Industry Relations seems to have acknowledged the potential of even small gifts and compensation to influence behavior, language on approval and management of significant potential conflicts of interest should be strengthened by the application of those standards. We understand informally that SIUSM conflict-of-interest policies may be developing new COI policies. Were the institution to advise AMSA that this is the case, this grade would be changed to "In process." This institution has not consented to allow portions of its policy to be cited for illustrative purposes.

Gifts and Meals	1	The Task Force recommendations are not necessarily binding and they cite AMA guidelines for gifts, which are very weak.
Consulting	1	The School of Medicine cites a state law which requires written approval from the institution president before faculty may accept anything of value for any consulting or research services. However, within its own policy, the School states that employees are only subject to oversight and/or management for outside professional activity that produces an annual income of over \$5,000. This policy also does not require a formal contract for external relationships.
Speaking	1	The School of Medicine cites a state law, which requires written approval from the institution president before faculty members accept anything of value for any consulting or research services. However, within a list of activities that need not be disclosed and need no oversight, the School listed honoraria under \$5,000 for speaking and other stipends for published scholarly works and presentations. The School of Medicine does require oversight and/or special management when totally annual compensation is over \$5,000, but in other ways, the policy does not prevent faculty engagement in long-term speaking relationships, or regulate content.
Disclosure	1	This policy does not include a general disclosure requirement. Though the School requires disclosure in some circumstances where a potential conflict of interest may exist, receiving honoraria, stipends, etc. under \$5,000 is exempt.
Samples	1	This policy generally discourages the use of samples, but has not created any policy that would significantly reduce the use of samples as a marketing tool.
Purchasing and Formulary	2	The School of Medicine requires that an individual should not participate directly in negotiations of equipment purchases when he or she has a significant economic interest in the equipment vendor. This policy does not make clear what constitutes a significant financial interest.
Industry Sales Reps	2	Pharmaceutical representatives are not allowed in patient care areas.
On-Site Educational Activities	2	This policy requires complete disclosure by CME presenters and organizers, and adheres to other ACCME standards for commercial support. The School of Medicine also requires that industry work through Office of CME to arrange conferences.
Off-Site Educational Activities	1	There is no clear policy on industry funding for off-site educational events.
Scholarships and Grants	2	The School of Medicine adheres to AMA guidelines, which permit scholarships for students if selection is made by the institution.
Curriculum	1	Medical school curriculum 1 This policy indicated that the medical school curriculum contains content related to marketing and relationships with industry, but did not supply any sample course materials or further specifics.

Oversight	Y	Oversight responsibility and mechanisms vary by policy.
Enforcement	Y	Sanctions for violations of certain policies are outlined.

Stanford University School of Medicine

Grade	B	A stand-out set of clearly reasoned policies and statements of purpose make Stanford University School of Medicine a lead example on how to codify industry interaction. The School of Medicine policies provide staff with instructions for managing or eliminating most potential financial conflict of interests that arise. Stanford's policies on consulting and speaking relationships are relatively weak, and place few explicit limits on their nature, duration, or value.
Gifts and Meals	3	The School of Medicine bans all personal gifts to staff, faculty, students and trainees both on-site and off-site, with the exception of non-faculty medical staff at non-Stanford School of Medicine operated clinical facilities.
Consulting	1	The only specific restrictions this policy places on consulting activities concerns time spent and, in some cases, the amount of compensation from consulting in proportion to the faculty member's School of Medicine salary.
Speaking	1	No policy has been provided for this domain, but the institution included a note stating that a policy was in development.
Disclosure	2	This institution has no comprehensive requirement for disclosure, but does require annual and ad hoc disclosures by faculty who work in certain prescribed capacities and have significant financial interests in entities as defined in the policy.
Samples	2	Samples given to individual staff members are considered personal gifts and are thus banned; however, samples may be accepted and distributed through the institution's pharmacies. A "Samples Policy" was referenced but not provided.
Purchasing and Formulary	2	Equipment and drug procurement committee members with financial interests must disclose them, but whether the staff member must recuse him/herself from the purchasing decision is at the discretion of the purchasing unit.
Industry Sales Reps	2	The institution has a policy that limits site access by industry representatives to appointment-only trainings on devices and other equipment in non-patient areas, but faculty may still invite industry representatives to facilities with approval of management. The policy also seems to allow industry representatives to call faculty to arrange such meetings.
On-Site Educational Activities	2	All education events sponsored by the Stanford School of Medicine "must be compliant with ACCME Standards for Commercial Support whether or not CME credit is awarded." ACCME standards, while better than some, do not represent the most rigorous policy on industry sponsorship of educational activities.
Off-Site Educational Activities	3	This strong policy language broadly bans the receipt of "compensation, including the defraying of costs, for simply attending a CME or other activity or conference (that is, if the individual is not speaking or otherwise actively participating or presenting at the event)."
Scholarships and Grants	3	The School of Medicine prevents industry from earmarking funds for individual students and requires that the department, program or division review the educational merit of the funded event.
Curriculum	2	This policy states that all students, residents, trainees and staff will receive training on potential conflicts of interest with industry, but no specific mechanism or plan for the training was shared.
Oversight	Y	The School of Medicine established a Conflict of Interest Review Program to assess significance of conflicts of interests, but the program does not oversee student and trainee compliance with applicable policies.
Enforcement	Y	The School of Medicine has a Conflict of Interest Committee that is responsible for determining what steps may be taken to ameliorate any conflicts of interest, but is not responsible for student and trainee conflicts of interest.

State University of New York Health Science Center at Brooklyn - SUNY Downstate

Grade	F	Continuing medical education and sponsored research are the focus of SUNY Downstate's policies, which place few restrictions on relationships of non-research faculty. The Center has also provided little detail regarding conflicts management in many of the domains, such as gifts, samples, industry representative site access, and disclosure of formulary committee conflicts. In many cases, it is unclear from the provided information to what extent SUNY Downstate, New York City and New York state policies on conflicts of interest overlap and how they are enforced.
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Gifts and Meals	1	The institution indicated in that the Health and Hospitals Corporation, New York's public hospital system, has indicated that it interprets the acceptance of free meals and gifts to be in violation of City rules. However, the text of this rule was not provided, nor was it clear whether the institution's administration itself agrees that the acceptance of gifts by faculty and/or students is in violation of City rule or State law. The PhRMA Code on Interactions with Healthcare Professionals is also referenced.
Consulting	1	The institution has provided a policy that addresses conflicts of interest related to consulting relationships of those conducting sponsored research. While the policy does require disclosure of some potential conflicts and management, it only applies to sponsored researchers.
Speaking	1	No policy, or policy not provided.
Disclosure	1	Disclosure only applies to sponsored researchers.
Samples	1	No policy was provided on pharmaceutical samples, but the Dean indicated that per hospital policy, samples are not permitted at the institution.
Purchasing and Formulary	1	The institution reports that the New York State Ethics Commission has expressed concern regarding state-employed physicians serving on formulary committees at SUNY Downstate receiving gifts from industry. It has warned such gifts are in violation of law, but it is unclear whether the institution administration agrees with this interpretation, and whether the institution has taken any steps to regulate industry relationships of committee members.
Industry Sales Reps	1	No policy was provided regarding site access, but the Dean did indicate that all industry representatives must report upon entering the institution facilities.
On-Site Educational Activities	2	The institution has a good on-site education policy for ACCME-accredited events, but monies were not required to be pooled in any sort of central fund, thus limiting the potential firewall between industry and medical professionals. Also, no policy was provided for educational events not ACCME-accredited.
Off-Site Educational Activities	1	No Policy or policy not provided.
Scholarships and Grants	1	No Policy or policy not provided.
Curriculum	1	No Policy or policy not provided.
Oversight	Y	This policy names parties responsible for oversight and compliance of research-related conflicts of interest policies.
Enforcement	Y	This policy references sanctions.

Stony Brook University School of Medicine

Grade	D	Strong limits on industry gifts, meals, and support for off-site education exist, but Stony Brook University School of Medicine is silent on purchasing, consulting, scholarships and site access; these domains may be addressed in other hospital or university policies that were not provided. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	3	Gifts of any value are banned in entirety. Meals are banned except in the context of educational functions that have been explicitly approved by the department chair. In addition, off-campus industry-sponsored meals are discouraged but not banned.
Consulting	1	No policy, or policy not provided.
Speaking	2	Faculty are allowed to participate in speakers bureaus on their own time, but are strongly encouraged to maintain full disclosure and objectivity. The approval of the department chair is required for any sponsored speaking activity during work hours.
Disclosure	1	Annual disclosure is only required for researchers; there is no mention of university- or staff-wide disclosure.
Samples	1	The School of Medicine bans drug samples from inpatient areas, emergency department, and ambulatory surgery. Since most sample distribution occurs in an out-patient setting, this policy has not placed a meaningful limit on drug samples at the center.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	1	A site access policy is alluded to but not provided.
On-Site Educational Activities	2	Educational programs are governed by ACCME standards for commercial support.

Off-Site Educational Activities	2	Trainees may not receive direct support for off-site education from industry. This policy implies that such support may be allowed if given to department heads or another centralized body.
Scholarships and Grants	2	This policy sets limits on travel funding to events, but does not address industry support of scholarships/trainee funds in a comprehensive way.
Curriculum	1	No policy, or policy not provided.
Oversight	N	No oversight mechanism referenced.
Enforcement N		Sanctions not referenced.

SUNY Upstate Medical University

Grade	B	Weak gifts language sets a tone that spills into consulting, speaking, and off-site education domains, allowing for industry to engage in both promotional and contractual giving with medical center faculty. The samples policy is strong, as is the purchasing and formularies language. We look forward to seeing the more comprehensive curriculum currently in development.
Gifts and Meals	1	This policy contains no serious limits on gifts; the only gifts language is embedded in pharmaceutical vendor site access policy, and allows for explicitly promotional gifts ("even if labeled with the donor's name.")
Consulting	1	Annual disclosure is required only of consulting relationships maintained by researchers/investigators. There is no institutional oversight of consulting relationships generally.
Speaking	1	No policy, or policy not provided.
Disclosure	1	No general disclosure; Only research applicants must annually file COI disclosure. Otherwise, disclosure is mandated only for P&T members and publications.
Samples	3	The pharmacy director must approve cases in which samples can be used, and if pharmacy services are temporarily unavailable, no more than 48 hours worth of medication may be given.
Purchasing and Formulary	3	Annual disclosure for all P&T members will be vetted at each new drug request, and "any member of the P&T committee who receives funds from a pharmaceutical company agrees to abstain on any vote pertaining to formulary changes regarding that company's drugs." Additionally, conflicts will be announced during deliberation.
Industry Sales Reps	2	Drug detailers are allowed on campus only by invitation and only in non-patient care areas.
On-Site Educational Activities	2	It was not clear whether this policy applies to educational activities outside the CME accreditation system. However, within it: "...funds should be in the form of an educational grant made payable to [the institution's] Faculty Student Association CME" and "there will be no scripting, emphasis, or influence on content by the Grantor or its agents."
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	3	The Medical University included an example of a case study on COI from an ethics course, and indicated that the graduate medical education department was in the process of developing a more comprehensive curriculum "relating to drug development, marketing, and relationships with industry for use across programs in the institution."
Oversight	N	Only pharmaceutical vendors are subject to oversight and sanctions.
Enforcement N		Only pharmaceutical vendors are subject to oversight and sanctions.

Temple University School of Medicine

Grade	D	This policy does not adequately address many of the scorecard domains, although it requires consulting contracts must be paid fair market value and prohibits faculty from serving on speakers bureaus. To strengthen its conflict of interest policies, this school should address gifts beyond the weak AMA guidelines on gift acceptance, system-wide disclosure, site access, and industry provision of scholarships. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
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Gifts and Meals	1	This policy stipulates that gifts should not be of substantial value and should benefit patients, which mirrors the relatively weak AMA guidelines on gift acceptance.
Consulting	2	Consulting contracts must be fair-market pay for legitimate services.
Speaking	2	Faculty members may not serve on a speakers' bureau, but there are no requirements on the independence of lecture content for those making presentations at bona fide conferences or professional meetings.
Disclosure	1	No disclosure policy provided.
Samples	1	The samples policy does not meaningfully limit the use of samples as a marketing tool.
Purchasing and Formulary	N/A	The institution does not make purchasing decisions.
Industry Sales Reps	1	No applicable policy provided.
On-Site Educational Activities	2	All funds for CME must be routed through the Office of Continuing Medical Education and may not go to individuals, but industry control over funds is not specified.
Off-Site Educational Activities	3	The institution prohibits the receipt of travel support or payment for attendance at off-site events
Scholarships and Grants	1	Policy not provided.
Curriculum	2	This policy makes general reference to departmental responsibility for curricular content on gifts to physicians.
Oversight	N	No oversight referenced.
Enforcement N		No sanctions referenced.

Texas A&M Health Science Center College of Medicine

Grade	F	Ethics in research is the only area truly addressed by Texas A&M Health Science Center College of Medicine policies. Other domains, such as education, samples and site access are not addressed. The College has created policies and outlined detailed processes for addressing conflicts of interest in sponsored research. Review committees and other parties responsible for policy enforcement and conflict management are named. The policies applicable to researchers are good in many areas, but could improve by casting a wider net and applying to areas outside sponsored research.
Gifts and Meals	1	The policy provided does not address gifts. Gifts are not mentioned in the College's list of conflicts of interest examples.
Consulting	1	This policy allows for the creation of rules by each component university and agency of the "System" to review potential conflicts of interest caused by compensation from consulting relationships. These are, however, only applicable to those engaging in sponsored research.
Speaking	1	No policy, or policy not provided.
Disclosure	1	Disclosure of potential conflicts of interest, significant financial interests and pertinent financial interests are addressed. These are reviewed on as-needed basis. The requirements only apply to sponsored research.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	1	Policy regarding participation in purchasing decisions only applies to researchers.
Industry Sales Reps	2	Industry sales representatives do not visit this medical school.
On-Site Educational Activities	1	No policy, or policy not provided.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	No policy, or policy not provided.
Oversight	N	Oversight established for researchers.
Enforcement N		Sanctions established for researchers.

Texas Tech University Health Sciences Center School of Medicine

Grade I School has indicated policy is still in draft form, and will be submitted once finalized.

The Brody School of Medicine

Grade	D	The Brody School of Medicine has set forth a set of policies that touch on many of the domains on which it was assessed, but are not likely to significantly reduce the impact of pharmaceutical industry marketing and influence.
Gifts and Meals	1	This policy states that gifts must be primarily for patient benefit, or be of minimal value and relate to the recipient's work.
Consulting	1	This policy explicitly bans "token consultative or advisory services" as a means to justify payments or defraying of travel costs. However, there seems to be no codified way to measure what is "token" vs. "bona fide."
Speaking	1	This policy states that honoraria for speaking engagements must be reasonable.
Disclosure	1	No policy, or policy not provided.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	2	Sales representatives must have an appointment to visit the School of Medicine.
On-Site Educational Activities	2	Lecture and conference organizers are responsible for all materials, content and methods.
Off-Site Educational Activities	2	"Subsidies or reimbursement by a pharmaceutical company or equipment vendor for travel expenses, lodging, or the individual's time to attend a conference is not permitted."
Scholarships and Grants	3	Sponsors of scholarships are permitted as long as the School of Medicine selects the recipient.
Curric	1	No policy, or policy not provided.
Oversight	N	No particular party is charged with overseeing student and faculty compliance with the policies.
Enforcement	Y	Sanctions are referenced in this policy.

Thomas Jefferson University - Jefferson Medical College

Grade I This institution has informed us that they are revising or developing new policies.

Touro College of Osteopathic Medicine – New York

Grade F This institution has not responded to AMSA's request for policies. This institution may be at least partially governed by broader policies, but has yet to describe the degree of its dependency. If it is clear that an institution cannot set its own policy, it will not be graded as an independent entity.

Touro College of Osteopathic Medicine - Vallejo

Grade C This institution may be at least partially governed by broader policies, but has yet to describe the degree of its dependency. If it is clear that an institution cannot set its own policy, it ought not to be assessed as an independent entity. Touro College of Osteopathic Medicine - Vallejo has policies that address many of the scorecard domains. The College has seems to have focused closely on trainee regulation and education regarding conflicts of interest, but has not set forth a system for monitoring physician consulting relationships with industry or any restrictions on the use of samples as a marketing tool.

Gifts and Meals 3 This policy prohibits personal gifts received on site by anyone, and received off-site by faculty, staff and trainees. The policy also prohibits on-site meals. "Personal gifts from industry may not be accepted anywhere at Touro University CA, College of Osteopathic Medicine, Touro University Medical Center, and the OPTI. In addition, Touro University CA faculty, staff and trainees may also not accept gifts at any non-Touro-operated clinical facility such as other hospitals, outreach clinics and the like."

Consulting	1	No policy, or policy not provided.
Speaking	2	College staff who actively participate in industry-funded meetings must determine their own lecture content.
Disclosure	1	The College provided no policy on disclosure that is applicable to all those who may have conflicts of interest.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	2	This policy requires that all individuals who play a role in making purchasing decisions disclose conflicts of interest. It is the decision of the purchasing unit whether those with conflicts must recuse themselves from the deliberations and/or purchasing decision.
Industry Sales Reps	2	Sales and marketing representatives must have an appointment to enter the institution, and are banned from in-patient areas.
On-Site Educational Activities	2	This policy requires that all industry funding for educational events adhere to ACCME standards for commercial support, whether or not CME credit is awarded.
Off-Site Educational Activities	3	This policy prohibits accepting compensation, "including the defraying of costs" for event attendance, and stipulates recipients of scholarships (which may be awarded for student attendance at industry-sponsored events) be selected by the College.
Scholarships and Grants	3	The College accepts scholarships for students and trainees if they are provided to institutional departments or divisions, and if the funded program is determined to have educational merit.
Curriculum 2		The College's curriculum covers training regarding industry interactions and potential conflicts of interest, but no specific information on courses or materials was provided.
Oversight	N	Within its policies the institution does not identify the parties responsible for oversight.
Enforcement	N	No sanctions for non-compliance are identified.

Touro University College of Osteopathic Medicine – Nevada Campus

Grade	F	This institution has not responded to AMSA's request for policies. This institution may be at least partially governed by broader policies, but has yet to describe the degree of its dependency. If it is clear that an institution cannot set its own policy, it will not be graded as an independent entity.
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Tufts University School of Medicine

Grade	I	This institution has indicated it is in the process of creating policies.
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Tulane University School of Medicine

Grade	F	This institution has declined to participate in AMSA PharmFree Scorecard 2008
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Uniformed Services University of the Health Sciences

Grade	A	A special case, Uniformed Services University of the Health Sciences is governed by overarching policies of the Department of Defense and the executive branch. Because of their specific (yet not medical-school-specific) nature, a follow-up phone call was required to understand how these policies applied to faculty and trainees at USU. This was a departure from an otherwise uniformly blinded scoring process. It was decided to include their assessment with this caveat, rather than omit USU from the scorecard.
Gifts and Meals	2	This policy does allow gifting, but contains some of the strictest control of gifting we have seen. Gifts are capped at \$50 max per year, and \$20 max per instance. Still, a complete ban on gifting would seem to be a simpler and stronger policy choice.
Consulting	2	The University requires strict review of all external relationships. A contract is not required, but a high level of detail is required in individual reporting for review.
Speaking	2	Stringent review (as above) is a substantial limit on speaking relationships. Speakers may only speak on areas of general expertise. Their presentation may not be more than 10% on their specific (government) research. Longevity of speaking relationships is not addressed in the policy, although stringent review may help to prevent participation in speakers' bureaus.

Disclosure	1	This policy stipulates public disclosure for employees above a certain pay level, and private disclosure for those involved in procurement etc. However, there is no general disclosure provision.
Samples	N/A	Military teaching hospitals may have samples policies, but USU itself does not dispense prescription drugs.
Purchasing and Formulary	3	Recusal is required for individuals in decision-making bodies when they have financial relationships with the entity under consideration.
Industry Sales Reps	N/A	Vendor access policies are hospital-specific and not regulated by USU. However overarching policy does require vendors go through a contracting office to show their products.
On-Site Educational Activities	2	This policy seems to only address CME activity, rather than all on-site education. For CME, the policy says USU must be responsible for content and speaker selection. A stronger policy would ensure funds are anonymized and establish a process for content review to ensure independence.
Off-Site Educational Activities	3	Travel funds for off-site event attendance must be approved. Gifts for attendance are prohibited under gifts policy.
Scholarships and Grants	3	Oversight of scholarship funds in place.
Curriculum	1	It was unclear whether medical school curriculum covers explicitly pharmaceutical interactions with physicians and trainees.
Oversight Y		Significant oversight established in policies.
Enforcement	Y	Well-delineated sanctions established in policies.

Universidad Central del Caribe School of Medicine

Grade **F** This institution has not responded to AMSA's request for policies.

University at Buffalo School of Medicine

Grade **F** This institution has not responded to AMSA's request for policies.

University of Alabama Birmingham School of Medicine

Grade	U	Grade: C The school has indicated that more comprehensive and unifying policies for the Health System and School of Medicine are under development. This was still the case as of May 23, 2008. The institution has strong existing policies for consulting and continuing education. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	1	Though cash-equivalents and lavish gifts such as jewelry, boats, and cars are prohibited, gifts of less ostentatious nature -- those much more likely to be given in the current regulatory climate -- are still permitted and encouraged, including meals and entertainment related to business, commemorative gifts, and those intended for educational purposes and patient satisfaction.
Consulting	3	Healthcare professionals and staff may consult if the terms are laid out in a written contract, payment is fair market value, and the services and deemed legitimate appropriate and necessary by the institution. In addition, the relationship must be disclosed in writing.
Speaking	1	The institution has indicated that a policy on speaking relationships is under development.
Disclosure	2	Annual disclosure of all financial conflicts of interest required of healthcare professionals.
Samples	1	Samples available for outpatient care with appropriate documentation. The institution has indicated that revised policies on samples are under development.
Purchasing and Formulary	2	Those making purchasing decisions must disclose conflicts of interest for institutional review prior to decisions regarding interested companies.
Industry Sales Reps	2	Vendor representatives allowed by appointment in non-patient care areas only.
On-Site Educational Activities	2	The SOM may accept donations from vendors as long as the SOM maintains sole control over the content and faculty of the programs. The SOM has indicated revised CME policies are under development.
Off-Site Educational Activities	2	Funds for travel or offsite education attendance must be given to an "SOM entity" which approves the event and selects the recipient.

Scholarships and Grants	3	The SOM must select recipients of scholarships and awards from industry.
Curriculum	1	The institution indicates that curriculum policy is under development.
Oversight Y		Oversight established
Enforcement Y		Sanctions referenced

University of Arizona College of Medicine

Grade I This institution has informed us that they are revising or developing new policies.

University of Arkansas for Medical Sciences

Grade	D	Limited areas are addressed by the University of Arkansas for Medical Sciences conflict of interest policy, which apply only to gifts, meals and support for off-site educational events. The few policies provided are very strong, but policies do not exist or were not provided for many domains. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	3	The University has banned all industry gifts and meals.
Consulting	3	Although addressed under language on travel, this policy states consulting relationships may only be for actual services rendered and require disclosure and prior approval.
Speaking	2	Although addressed under language on travel, this policy states speaking relationships may only be for actual services rendered and require disclosure and prior approval. This policy does not prohibit participation in speakers bureaus or other such long-term engagements.
Disclosure	1	No policy, or policy not provided.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	1	No policy, or policy not provided.
On-Site Educational Activities	1	No policy, or policy not provided.
Off-Site Educational Activities	3	Travel funds and scholarships may be accepted only with prior approval.
Scholarships and Grants	1	Policy language on training funds does not seem to apply to students, but only to "employees."
Curriculum	1	No policy, or policy not provided.
Oversight	N	No party named responsible for oversight in this policy.
Enforcement	N	Sanctions not referenced in this policy.

University of California - Irvine School of Medicine

Grade	B	University of California - Irvine has cited the UC system-wide vendor relations policy as its complete submission to AMSA Pharm-free Scorecard 2008. The UC system-wide policies are very strong in areas such as samples, educational events and scholarships. However, the umbrella policies do have some limitations, particularly in the regulation of external consulting and speaking relationships. UCI would do well to examine current or develop new internal policies covering these domains.
Gifts and Meals	2	UC system-wide vendor relations policy: Gifts and on-site meals provided directly by vendors are prohibited, inclusive of samples. However, gifts distributed at educational conferences are still allowed if the conference is accredited and all attendees are offered the gift. The specific example given was a branded tote bag. This exception undermines the attempt to remove the influence of gifting, and thus this domain must be scored a 2 rather than a 3.

Consulting	1	UC system-wide vendor relations policy: Consulting relationships must be disclosed. However, there is no provision for a formal contract or review/approval of these relationships.
Speaking	1	UC system-wide vendor relations policy: Speaking relationships are not limited in their longevity, nor are there any controls placed on content or institutional review.
Disclosure	1	UC system-wide vendor relations policy: Certain employees must disclose, and all consulting relationships must be disclosed, but there is no annual disclosure required of all employees.
Samples	3	UC system-wide vendor relations policy: Samples may never go directly to physicians. They may only be donated to the department for trial in the minimum amount necessary, or donated for use at free clinics or by indigent patients only.
Purchasing and Formulary	3	UC system-wide vendor relations policy: The policy reiterates the California Political Reform Act, which has been interpreted to prohibit individuals with financial relationships with an outside entity from participating in or influencing institutional decisions concerning that outside entity.
Industry Sales Reps	2	UC system-wide vendor relations policy: By appointment only, and only in non-patient care areas. The institution has also created a commendable firewall: "Health Care Vendor sales and marketing representatives may no longer leave any [branded] written materials with employees."
On-Site Educational Activities	2	UC system-wide vendor relations policy: ACCME standards for commercial support apply to both accredited and non-accredited educational events organized by UC system universities.
Off-Site Educational Activities	3	UC system-wide vendor relations policy: No employee may accept travel or payment for attending off-site events. Travel and payment may only be accepted if providing a real service to the entity subsidizing said travel/payment.
Scholarships and Grants	3	UC system-wide vendor relations policy: Only the department may select the recipients of scholarships and grants funded by industry.
Curriculum	3	UC system-wide vendor relations policy: Mandatory training for all employees and students on proper interaction with vendors and the nature of marketing influence.
Oversight	N	UC system-wide vendor relations policy: No oversight established.
Enforcement N		UC system-wide vendor relations policy: Sanctions not referenced.

University of California Davis School of Medicine

Grade	A	An exemplary conflict-of-interest policy at University of California -Davis School of Medicine paved the way for the strong policies adopted systemwide in the UC schools this year. The policy has extended its reach to all vendor relations at the university, not just those with pharmaceutical representatives. Consulting and speaking components, while detailed, do not cover all such relationships (\$20,000 floor), and there is no indication to what extent these policies are reflected in the curriculum for medical students.
Gifts and Meals	3	All gifts are prohibited, and a comprehensive explication indicates that meals, promotional items, education and travel are all banned as such.
Consulting	2	As part of the Health Sciences Compensation Plan, each department in the School of Medicine must set its own Annual outside earnings approval threshold, not to exceed \$20,000/year or 20 percent base health sciences salary. Though in many ways this policy is exemplary, there is no approval or limits on consulting relationships under \$20,000/year, which would be required for a 3.
Speaking	2	Speaking relationships are covered under the above consulting policy.
Disclosure	2	It is unclear whether the annual disclosure required of "designated officials" covers all faculty and staff. If clarified as comprehensive, this policy could receive a 3.
Samples	3	Samples are prohibited. "Free samples, supplies, or equipment designated for an individual are considered a gift and are prohibited. Vendors may donate their product for evaluation or educational purposes to a unit of the University if the administrative head of the unit approves the donation."
Purchasing and Formulary	3	Persons may not partake in decisions concerning entities with which they have financial conflicts.
Industry Sales Reps	2	Vendors may be on-site only by invitation.

On-Site Educational Activities	3	Industry funds for continuing education must be deposited in a central fund at the Office of Continuing Medical Education, which then disburses all grants.
Off-Site Educational Activities	3	All funds for meeting attendance must be provided to Health Sciences Advancement, not directly to the recipient. Industry may not select award recipients.
Scholarships and Grants	3	The School of Medicine's gifts ban explicitly prohibits industry from earmarking scholarships and other trainee funds.
Curriculum	3	UC system-wide vendor relations policy: Mandatory training for all employees including students on proper interaction with vendors and the nature of marketing influence.
Oversight	Y	This policy establishes oversight.
Enforcement	Y	This policy establishes sanctions.

University of California Los Angeles - David Geffen School of Medicine

Grade	A	New University of California system-wide policies have helped bring University of California - Los Angeles David Geffen School of Medicine from a B to an A. Rounded out by a strong samples policy, a decisive prohibition on gifts and on-site meals are the clear highlights of the policies on industry relationships. However, the sections on consulting and speaking relationships do not institute measures for review or approval of such relationships, or even a requirement for a contract describing legitimate services and appropriate payment.
Gifts and Meals	3	The School of Medicine uses model language for a comprehensive gift ban, defining and then prohibiting all gifts and on-site meals provided by industry.
Consulting	1	Consulting is defined as a "Category II" activity under the institution's "Conflict of Commitment and Outside Activities of Faculty Members" policy, and thus requires annual disclosure, but no contract or prior approval. The policy imposes a consulting limit of 39 academic days, or 48 days for fiscal-year faculty.
Speaking	1	Speaking relationships would seem to fall under "Category II" in the "Conflict of Commitment and Outside Activities of Faculty Members" policy, and as such do not require prior approval. They are limited to 39 academic/48 year round days, however this is a limit on frequency, not longevity.
Disclosure	2	Annual disclosure by all faculty with conflicts is required; however this policy makes this somewhat unclear by separating disclosure requirements into different sub-sections. A stronger policy would have an overarching disclosure requirement for all personnel, not just those with conflicts, and an even stronger policy would disseminate this information publicly.
Samples	3	UC system-wide vendor relations policy: Samples may never go directly to physicians. They may only be donated to the department for trial in the minimum amount necessary, or donated for use at free clinics or by indigent patients only.
Purchasing and Formulary	3	This policy reiterates the California Political Reform Act, which prohibits individuals with outside entity financial relationships from participating in or influencing institutional decisions concerning that outside entity.
Industry Sales Reps	2	The School of Medicine indicates that site access will be overseen by leadership, but there are no more stringent limitations.
On-Site Educational Activities	2	This policy relies on adherence to ACCME standards for commercial support to govern on-site educational events.
Off-Site Educational Activities	3	This policy prohibits the receipt of gifts, payments and travel support from industry for attendance at off-site events.
Scholarships and Grants	3	This policy prevents industry from selecting recipients of funds.
Curriculum	3	UC system-wide vendor relations policy: Mandatory training for all employees including students on proper interaction with vendors and the nature of marketing influence.

Oversight	Y	This policy references an oversight body.
Enforcement	N	This policy does not reference sanctions.

University of California San Diego School of Medicine

Grade		Grade: B The system-wide policy is under review, reports University of California San Diego School of Medicine. However, new University of California system-wide vendor relations policies have permitted an initial scoring. The UC system-wide policies are very strong in areas such as samples, educational events and scholarships. However, the umbrella policies do have some limitations, particularly in the regulation of external consulting and speaking relationships. UCSD would do well to examine or develop internal policies covering these domains.
Gifts and Meals	2	UC system-wide vendor relations policy: Gifts and on-site meals provided directly by vendors are prohibited, inclusive of samples. However, gifts distributed at educational conferences are still allowed if the conference is accredited and all attendees are offered the gift. The specific example given was a branded tote bag. This exception undermines the attempt to remove the influence of gifting, and thus this domain must be scored a 2 rather than a 3.
Consulting	1	UC system-wide vendor relations policy: Consulting relationships must be disclosed. However, there is no provision for a formal contract or review/approval of these relationships.
Speaking	1	UC system-wide vendor relations policy: Speaking relationships are not limited in their longevity, nor are there any controls placed on content or institutional review.
Disclosure	1	UC system-wide vendor relations policy: Certain employees must disclose, and all consulting relationships must be disclosed, but there is no general annual disclosure required of employees.
Samples	3	UC system-wide vendor relations policy: Samples may never go directly to physicians. They may only be donated to the department for trial in the minimum amount necessary, or donated for use at free clinics or by indigent patients only.
Purchasing and Formulary	3	UC system-wide vendor relations policy: The policy reiterates the California Political Reform Act, which has been interpreted to prohibit individuals with financial relationships with outside entities from participating in or influencing institutional decisions concerning that outside entity.
Industry Sales Reps	2	UC system-wide vendor relations policy: drug sales representatives may visit the School by appointment only, and only in non-patient care areas. UCSD has also instituted a commendable firewall: "Health Care Vendor sales and marketing representatives may no longer leave any [branded] written materials with employees."
On-Site Educational Activities	2	UC system-wide vendor relations policy: ACCME standards for commercial support apply to both accredited and non-accredited educational events organized by UC system universities.
Off-Site Educational Activities	3	UC system-wide vendor relations policy: No employee may accept travel or payment for attending off-site events. Travel and payment may only be accepted if providing a real service to the entity subsidizing said travel/payment.
Scholarships and Grants	3	UC system-wide vendor relations policy: Only the department may select the recipients of scholarships and grants funded by industry.
Curriculum	3	UC system-wide vendor relations policy: Mandatory training for all employees including students on proper interaction with vendors and the nature of marketing influence.
Oversight	N	UC system-wide vendor relations policy: No oversight established.
Enforcement N		UC system-wide vendor relations policy: Sanctions not referenced.

University of California San Francisco School of Medicine

Grade		
	A	New University of California system-wide policies have largely mitigated the concern that earlier University of California - San Francisco School of Medicine policies were guidelines only and "meant to be an interim step in the development of more broad-based policies for all UCSF faculty, students and staff." The guidelines cover all the relevant domains on which UCSF was assessed, and address the factors that can create conflicts of interest quite well. It is important to note that domains not covered by UC System policies would still be guidelines, and UCSF would do well to address and strengthen these areas.
Gifts and Meals	2	No personal gifts may be accepted by School of Medicine students, staff or faculty. The institution discourages gifts of any kind as part of non-professional activities. In addition, no meals funded directly by industry may be given at any School of Medicine location. This guideline is strengthened by UC system-wide vendor relations policy: Gifts and on-site meals provided directly by vendors are prohibited, inclusive of samples. However, gifts distributed at educational conferences are still allowed if the conference is accredited and all attendees are offered the gift. The specific example given was a branded tote bag. This exception undermines the attempt to remove the influence of gifting, and thus the School scored a 2 rather than a 3 in this domain.
Consulting	1	The School of Medicine calls for institutional review of only those agreements with potential conflicts of interest. There is no provision for a formal contract or appropriate payment for legitimate services.
Speaking	2	Compensation for speaking engagements must be reasonable, and the event or meeting must have been developed in accordance with ACCME guidelines.
Disclosure	2	Disclosure requirements appear only in a policy on conflicts of interest that pertain to receiving/disbursing research funds. Despite the policy's name, it seems to require internal disclosure by all faculty who meet certain criteria for having a potential conflict of interest.
Samples	3	UC system-wide vendor relations policy: Samples may never go directly to physicians. They may only be donated to the department for trial in the minimum amount necessary, or donated for use at free clinics or by indigent patients only.
Purchasing and Formulary	3	Strong language. "Faculty or staff who serve as consultants, members of a speakers' bureau, have an equity interest in or another relationship with industry for which they receive personal compensation or other support must recuse themselves from deliberations or decision-making regarding the selection of products or services to be provided to the Medical Center or School of Medicine (e.g. selection of drugs to be added to the formulary) by the company."
Industry Sales Reps	2	In general, representatives are permitted in non-patient care areas by appointment only, although each UCSF medical institution and medical center may have its own policies. UC system-wide vendor relations policy: By appointment only, and only in non-patient care areas. UCSF has also instituted a commendable firewall: "Health Care Vendor sales and marketing representatives may no longer leave any written materials with employees"
On-Site Educational Activities	2	The School of Medicine requires that all on-site educational activities adhere to ACCME standards and that all industry funds be given in the form of an unrestricted grant. UC system-wide vendor relations policy: ACCME standards apply to both accredited and non-accredited educational events organized by UC system universities.
Off-Site Educational Activities	3	The School of Medicine does not permit the acceptance of gifts or compensation of expenses for attending a CME event or listening to a sales talk by a representative of a commercial interest that distributes health care goods or services. UC system-wide vendor relations policy: No employee may accept travel or payment for attending off-site events. Travel and payment may only be accepted if providing a real service to the entity subsidizing said travel/payment.
Scholarships and Grants	3	Funds and scholarships for students and trainees may be provided by industry, but industry may not select the recipient and the School of Medicine must determine that the event has educational merit. UC system-wide vendor relations policy: Only the department may select the recipients of scholarships and grants funded by industry.
Curriculum	3	The School of Medicine did not provide a policy or examples indicating that its curriculum addresses conflicts of interest in relation to industry marketing. UC system-wide vendor relations policy: Mandatory training for all employees including students on proper interaction with vendors and the nature of marketing influence.
Oversight	Y	Chancellor's Conflict of Interest Advisory Committee is responsible for overseeing conflicts of interest as assessed by the disclosure policy.

Enforcement N The School of Medicine has introduced guidelines only on conflicts of interest, and listed no sanctions for non-compliance.

University of Chicago Pritzker School of Medicine

Grade	B	Final policies for this institution have been submitted along with additional policies on curricular content and disclosure requirements for a requested reassessment. The policies provided are strong, and include a centrally-managed samples system and a ban on personal gifts and meals to physicians. In addition, policies on industry control of funding for continuing medical education are excellent. A Medical Center policy requires all faculty and staff at the Medical Center to make annual disclosures, however this policy would not apply to faculty and staff at the medical school that did not work at this clinical facility.
Gifts and Meals	3	This institution's policy bans personal items, gifts, discounts and other items of value, including meals. The policy cites multiple examples of what is covered by the ban and clarifies that the policy applies regardless of site or circumstance. The policy is strong and unequivocally presented.
Consulting	2	Compensation for consulting relationships must be fair market value.
Speaking	2	Compensation for speaking engagements must be fair market value.
Disclosure 1		Disclosure requirements are clearly established for researchers at the institution; however, disclosure requirements for the entire faculty population are more ad-hoc. The policy provided advises that staff employees should disclose external relationships that may influence or appear to influence his or her official decisions in university matters. It does not require that all faculty disclose their external relationships on a regular basis. It also seems to leave the decision whether a relationship might present a conflict up to the individual without a great deal of guidance. We are aware that a Medical Center policy requires all faculty and staff at the Medical Center to make annual disclosures, however this policy would not apply to faculty and staff at the medical school that did not work at this clinical facility.
Samples	2	The institution centrally manages samples through its retail pharmacy and a voucher system.
Purchasing and Formulary	2	Each committee member must disclose any conflicts to the committee on which he/she serves prior to any discussions on matters that may present a conflict of interest.
Industry Sales Reps	2	Industry representatives are only permitted in non-patient care areas and must have an appointment.
On-Site Educational Activities	2	It is not clear that industry does not have control over funds given for on-site educational events – "they may request how such monies are spent"
Off-Site Educational Activities	3	Funding for off-site educational events must follow the same protocol outlined in the on-site continuing education section. Fund recipients may not be chosen by the sponsor.
Scholarships and Grants	3	Funding for trainees and scholarships must follow the same protocol outlined in the on-site continuing education section. Fund recipients may not be chosen by the sponsor.
Curriculum	3	This institution has provided curricular materials that clearly establish its strong track record in educating students about the impact of pharmaceutical marketing on prescribing.
Oversight Y		Oversight referenced
Enforcement	N	Sanctions not referenced

University of Cincinnati College of Medicine

Grade	C	This institution is strong in the education domains -- curriculum, scholarship, and Continuing Medical Education (though this last policy has recently been weakened). The gifts ban is confusing -- a complete ban seems later negated by allowance of those nominal or educational in nature. The policy requires pre-approval of consulting relationships, but exempts 'occasional lectures' from annual disclosure. Good language about samples as marketing tools is not supported by a samples policy that meaningfully limits their use as industry marketing tools.
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Gifts and Meals	3	The College of Medicine prohibits the acceptance of gifts under any circumstances. In addition, meals directly funded by industry are not permitted.
Consulting	2	Pre-approval of consulting relationships is required but there are no contract or payment stipulations.
Speaking	1	The policy exempts 'occasional lectures' from annual disclosure. No other applicable policy provided.
Disclosure	1	Though this institution has an annual disclosure policy, the list of exceptional relationships that do not require reporting is too extensive to make the policy a meaningful conflict of interest gauge.
Samples	1	Though warning language about the use of samples as marketing tools is embedded in the policy, the _ makes no major steps to reconfigure a samples policy that curtails such influence.
Purchasing and Formulary	1	No applicable policy provided.
Industry Sales Reps	2	Though this policy indicates "appointments are mandatory," the language around site access does not expressly forbid uninvited visits by sales reps.
On-Site Educational Activities	2	Though the policy requires all on-site medical education to meet ACCME standards, it no longer requires that industry-supported meetings have independent content/speakers.
Off-Site Educational Activities	3	Provisions of the gift ban and scholarship policy ban travel-related expenses for non-bonafide services, and prevent industry from selecting recipients of travel grants.
Scholarships and Grants	3	Industry must not select recipient of the support.
Curriculum	3	Great module from Family Medicine course provided.
Oversight	Y	Establishes an industry interactions committee charged with oversight, coordination, education, and interpretation of this policy.
Enforcement Y		This policy makes reference to sanctions.

University of Colorado Denver School of Medicine

Grade	B	This institution has an exemplary gift ban and meaningful curbs on industry speaking engagements, pharmaceutical samples, and continuing medical education. Hospital 2 restricts site access for vendors to appointments in non-patient care areas; Hospital 1 requires members of purchasing committees to disclose conflicts of interest but does not require automatic recusal from relevant decisions or the committee.
Gifts and Meals	3	This institution uses model language in its complete gift and meal ban. Personal gifts are forbidden (no dollar limit) and a comprehensive list of examples is provided.
Consulting	2	This policy prohibits no strings attached grants, and in doing so, excepts fairly compensated services rendered. Despite this exemplary language, prior institutional approval of consulting relationships is not required per this policy.
Speaking	3	This policy, which embeds speakers' bureaus in a problem statement about undue industry influence, bans faculty, staff, students, and residents from participating in a speakers bureau if any of the content is created or approved by industry, if compensation is above fair-market value, if the overall purpose of the course is marketing, or if attendees are compensated for attending. Furthermore, all speaking relationships and their contracts must be reviewed and approved by the University.
Disclosure	2	This policy refers to required annual disclosure of all potential conflicts of interest for students, residents, faculty and staff.
Samples	3	Individual students, residents and faculty members may not accept free or discounted drug samples, medical devices or other supplies from industry or industry representatives. Samples are only allowed in hospital units with specified policies.
Purchasing and Formulary	2	One of the main teaching hospitals for this institution requires members of purchasing committees to disclose all relevant conflicts to the committee chair, but does not provide for automatic recusal from interested decisions or the committee.
Industry Sales Reps	2	One of the main teaching hospitals for this institution prohibits vendor representatives from entering patient care areas or being on premises without an appointment.

On-Site Educational Activities	3	Industry may contribute unrestricted funds for continuing education, which includes "recurring structured conferences"; such funds are managed through a "central, conflict-free account" managed at the level of the academic unit, which retains sole discretion over speakers, topics, and materials.
Off-Site Educational Activities	3	Students, residents, and faculty members may not accept gifts, monetary stipends, paid travel, or honoraria solely for attendance at industry-sponsored dinners, lectures or sales presentations. Some industry support may be accepted if recipients are selected by the institution. Other exceptions include training on medical devices, or grant development.
Scholarships and Grants	3	Excepted from ban referenced in 5B, an academic unit may create a central fund to support travel to and participation in educational events. This fund must be conflict free.
Curriculum	3	This policy demonstrates a deep understanding that curricular content on industry marketing and conflicts of interest is integral to a meaningful and workable policy. Provisions require curriculum that promotes comprehension of potential conflicts as well as evidence-based medicine research strategies
Oversight	Y	This policy references an implementation team.
Enforcement N		This policy does not make reference to sanctions.

University of Connecticut

Grade		Grade: D This institution has indicated it is currently drafting new policies to be completed during the 2008-2009 academic year. However draft policies were submitted for review and these are assessed below: University of Connecticut School of Medicine's policy outlines restrictions on trainee interactions with industry, although the School of Medicine's response to a request for policies states on an accompanying checklist that the included policies apply to "all clinicians involved in medical student education." The policy seems to be specifically written with trainees in mind, and it is unclear to whom each portion applies. University of Connecticut School of Medicine has taken significant steps in reducing the potential for conflicts on interest between trainees and industry.
Gifts and Meals	2	This policy bans personal gifts to trainees, but permits medical staff at non-medical school clinical facilities to accept gifts. The policy also bans meals for trainees directly funded by industry.
Consulting	1	This policy seems mainly aimed at trainee interactions with industry and does not address consulting relationships.
Speaking	1	This policy seems mainly aimed at trainee interactions with industry and does not address speaking engagements. ACCME standards apply only to on-site events.
Disclosure	1	There is no provision for general disclosure. The only explicit requirements for disclosure apply to trainees' scholarly publications.
Samples	1	The only explicit restriction on samples is that they not be used by trainees or faculty for themselves or family.
Purchasing and Formulary	1	No part of the policy applies specifically to purchasing committee members.
Industry Sales Reps	2	Industry representatives may be allowed in non-patient areas by appointment only, and may only interact with trainees under the supervision of a faculty member.
On-Site Educational Activities	2	The School of Medicine requires that all on-site education programs adhere to ACCME standards for commercial support.
Off-Site Educational Activities	2	The School of Medicine bans trainees from accepting gifts or compensation for listening to a sales talk by an industry representative, but does not place explicit restrictions on other staff.
Scholarships and Grants	3	Industry is prevented from choosing the recipient of scholarship funds, and the educational event for which the trainee is being funded must have educational merit.
Curriculum	1	No policy, or policy not provided.
Oversight	N	This policy does not designate a party responsible for oversight of trainee or faculty compliance.
Enforcement	N	There are no sanctions for noncompliance outlined in this policy.

University of Florida College of Medicine

Grade **F** University of Florida College of Medicine has declined to participate in AMSA Pharm-Free Scorecard 2008.

University of Hawai'i John A Burns School of Medicine

Grade	F	University of Hawai'i John A Burns School of Medicine has implied that it is not a clinical facility and therefore it is not necessary to create policies in many of the domains on which it was assessed. It should be noted that other schools and colleges of medicine, which are not clinical facilities themselves, have created policies on conflicts of interest that apply to many of the domains assessed. Outside of the mandatory disclosure of potential conflicts of interest, the School of Medicine has virtually no policies that would explicitly decrease the potential for staff conflicts of interest. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	1	No policy, or policy not provided.
Consulting	1	This institution did not provide a policy that requires any review of, or places limits on, staff and faculty consulting relationships beyond general disclosure.
Speaking	1	No policy, or policy not provided.
Disclosure	2	All faculty and staff must disclose all potential conflicts of interest to supervisors on a regular basis.
Samples	N/A	This institution is not a clinical facility and therefore does not have a samples policy.
Purchasing and Formulary	N/A	This institution had indicated that it and its staff members do not make purchasing or formulary decisions.
Industry Sales Reps	N/A	This institution is not a clinical facility and cited this reason for not providing a policy on pharmaceutical sales representative site access.
On-Site Educational Activities	1	This institution did not provide a policy regarding on-site education, but did reference a CME consortium affiliated with the ACCME. Not enough information about this consortium was provided to determine whether the school of medicine adheres to standards of commercial support.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	This institution indicated that the curriculum contains content on industry marketing and conflicts of interest, but has not included this in a policy, and did not provide and documentation of such curricular content.
Oversight	N	This institution indicated there is nothing significant to oversee, and therefore has not created an oversight system.
Enforcement	Y	Failure to comply with the disclosure portion of the policy carries the same sanctions as non-compliance with any other University policy.

University of Illinois College of Medicine at Chicago

Grade	D	This institution's conflicts of interest policies are generally weak. Many domains on which they were assessed are not addressed by the provided documents. The institution does have some progressive policies that limit interaction with drug company sales representatives. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	1	The institution did not provide any policies on pharmaceutical company gifts and meals except in the context of graduate medical education.
Consulting	1	No policy provided.
Speaking	1	No policy provided.
Disclosure	1	No policy provided.
Samples	1	The institution has banned the inpatient use of samples, but outpatient samples are permitted. Concerningly, physicians' personal use of samples is explicitly permitted.

Purchasing and Formulary	1	No policy provided.
Industry Sales Reps	2	Pharmaceutical sales representatives must complete orientation before being permitted on-site. Meetings must be held in non-patient areas and by appointment only.
On-Site Educational Activities	1	The institution did not provide on-site education policies except in the context of graduate medical education, which only apply to fellows and residents.
Off-Site Educational Activities	1	No policy provided.
Scholarships and Grants	1	No policy provided.
Curriculum	3	The institution's resident curriculum includes portions on managing encounters with industry representatives.
Oversight N		Oversight not established
Enforcement	Y	Sanctions referenced under GME

University of Illinois College of Medicine at Peoria

Grade	D	This institution may be at least partially governed by broader policies, but has yet to describe the degree of its dependency. If it is clear that an institution cannot set its own policy, it ought not be graded as an independent entity. Policies submitted by University of Illinois College of Medicine at Peoria are generally weak and do not go beyond AMA and/or ACCME guidelines. The College deserves recognition for stressing the regulation of student-industry interactions in its curriculum. Though the College indicated in its policy submission that university-wide policies do mandate disclosure, a copy of this policy was not provided for assessment.
Gifts and Meals	1	This gifts policy does not go further than AMA guidelines, which are not considered a meaningful limit on industry gifting.
Consulting	1	This policy does not require oversight of or a formal contract for consulting relationships.
Speaking	1	This policy has not established any specific limits on speaking relationships.
Disclosure	1	The College has indicated that a university policy requires disclosure of all outside revenue-generating activities, but such a policy was not provided (See overall comments.)
Samples	1	This policy allows physicians to receive samples for distribution, but notes that it is unacceptable for a detailer to require face-to-face interaction to obtain samples.
Purchasing and Formulary	N/A	This policy does not make formulary or drug purchasing decisions.
Industry Sales Reps	1	This policy set few specific limitations on vendor access to facilities; a Department of Pharmacy policy on vendors was referred to but not provided.
On-Site Educational Activities	2	This policy follows ACCME guidelines for accredited educational events. For non-accredited events, the College requires that the presentation must be approved by a faculty member.
Off-Site Educational Activities	1	The College indicated that there is no policy regarding attendance at off-site educational events sponsored by industry.
Scholarships and Grants	3	Industry support of scholarships for students and residents are permitted as long as the College may choose the recipient.
Curriculum	2	This College makes note a training session on marketing tactics and effects of gift-giving, but the training in question is for residents and fellows, and curriculum for medical students was not addressed. Furthermore, it is unclear how strong the content of such training might be in light of such an anemic gifts policy.
Oversight	N	It is not clear who is responsible for oversight of the policies applicable to staff and students, although university policies (not provided) may have separate oversight mechanisms.
Enforcement	N	No specific sanctions were listed for non-compliance with the policies provided, although university policies (not provided) may have sanctions for non-compliance.

University of Illinois College of Medicine at Rockford

Grade | AMSA has learned that this institution may be at least partially independent from other UIC campus schools. An In Process designation will remain in place while a response to the Scorecard is solicited. The University of Illinois is currently developing policies for the regional campuses to reflect the policies developed for the Chicago campus

University of Illinois College of Medicine at Urbana-Champaign

Grade | AMSA has learned that this institution may be at least partially independent from other UIC campus schools. An In Process designation will remain in place while a response to the Scorecard is solicited. The University of Illinois is currently developing policies for the regional campuses to reflect the policies developed for the Chicago campus

University of Iowa Carver College of Medicine

Grade | This institution is in the process of developing a comprehensive policy for the medical school and affiliated hospital. It intends to move from a group of separate policies to a single policy that will cover the items assessed by this instrument. The institution anticipates this process will be completed by the end of 2008.

University of Kansas School of Medicine

Grade **B** This institution has enacted exemplary policies in areas concerning gifts, consulting relationships, and industry support of educational events. Regarding the latter, KUMC is one of only a few institutions that have created a truly centralized account for the pooling of industry funds to ensure events are independent of industry control. Policies in other areas are strong as well, including comprehensive disclosure regulations and policy preventing samples from going directly to physicians. Policies on speaking relationships could be strengthened by clearly prohibiting long-term speaking relationships such as speakers' bureaus. In addition, Kansas provided a helpful Q&A to clarify its policy on gifts and meals, and establishment of a committee including faculty to provide "continued, real-time input" into the policy suggests that this institution is committed to engagement and enforcement of these standards.

Gifts and Meals 3 All gifts and meals are prohibited on- and off-campus, except within large settings "widely attended," such as professional society meetings.

Consulting 3 Commendable public disclosure is stipulated: "To better ensure independence, scientific integrity and full transparency, consulting agreements and unconditional grants will be posted on [the institution's] website by OIC." In addition, all consulting must be documented in a formal contract with payment and specific deliverables.

Speaking 2 Sadly, the School of Medicine recently weakened its ban on speakers bureaus to "discouragement" of them. Current policy on speaking prevents industry control of content, but doesn't prevent long-term speaking relationships.

Disclosure 2 This institution has a strong disclosure policy mandating annual internal reporting of all potential conflicts of interest by all full and part-time faculty. Clinical researchers at this institution must also report their disclosures publicly. Further, the Office of Compliance is in the process of developing a website that will publicly report other selected disclosure information.

Samples 2 Hospital policy commendably states that pharmaceutical samples brought on site must go directly to the Pharmacy Department. Further, they are not to be used during a patient's stay in outpatient care, and doctors writing prescriptions for sample medication are responsible for patient education.

Purchasing and Formulary 3 Hospital policy first establishes P&T committee members as "Key Employees", and then goes on to clearly state that "A Key Employee having conflict of interest will not participate in negotiating or approving any Transaction, Competitive Affiliation or other situation that gives rise to the Conflict of Interest"

Industry Sales Reps 2 All vendor representatives that wish to come on-site must have an appointment and must register with Vendor Registration at every visit. Vendor representatives are not allowed in patient care areas.

On-Site Educational Activities 3 A central account, 'not designated for use by specific individuals,' will be used to reposit all educational grants from industry, which must be unrestricted.

Off-Site Educational Activities 3 Manufacturers interested in having faculty, house-staff or students attend meetings should provide grants to a designated fund at the School of Medicine. This body will then disburse funds to faculty and training program directors. Neither faculty nor trainees will be directly dependent on individual generosity for their educational opportunities.

Scholarships and Grants	3	Economic opportunities are considered gifts and banned as such; unrestricted grants may be provided for education, but recipient may not be specified by donor.
Curriculum	2	This institution has course offerings in place on the pharmaceutical industry as well as medical ethics in research. However, materials illustrating course content have not yet been provided.
Oversight	Y	This policy specifies an oversight mechanism.
Enforcement Y		Sanctions referenced

University of Kentucky College of Medicine

Grade	B	This institution has provided strong policies in many domains, especially its processes for approval and monitoring of outside business and professional relationships. The requirement for industry sales representatives to complete an orientation program and the ban on samples at the hospital clearly indicate the institution's goal to limit industry's marketing presence. Provided policies have not, however, addressed industry influence over content of CME on campus or shown that its curriculum has any significant education on conflicts of interest that can arise due to interactions with pharmaceutical industry.
Gifts and Meals	1	This institution's gifts policy is generally in line with PhRMA guidelines, with an additional \$300 annual aggregate limit, which continues to allow for substantial gifting.
Consulting	3	The institution goes to great lengths to ensure that all consulting arrangements of its employees are appropriate. Consulting arrangements must be reviewed by the Corporate Compliance Office prior to acceptance. In addition, the arrangements, including deliverables, must be described in a contract, and all remuneration must be based on fair market value for services provided.
Speaking	3	Excellent language: "Vendor relationships with physicians...where compensation is paid for marketing activities such as speaking...are suspect and payment may not be accepted as 'consulting' fees, even if the physicians is required to perform services..."
Disclosure	1	No annual or periodic disclosure is required.
Samples	3	The institution does not allow samples at the campus hospital, but the policy language suggests that they are permitted at affiliated and off-site practices.
Purchasing and Formulary	3	If a committee member has an applicable relationship or conflict, he/she may not participate in decision-making processes.
Industry Sales Reps	2	The institution requires industry representatives to have pre-scheduled appointments. In addition, it requires representatives to pay an annual fee for a campus identification badge that is required to be worn at all times on site.
On-Site Educational Activities	1	The restrictions that the institution has placed on industry funding of CME events do not address industry influence over speakers or educational content at such conferences, they only address the funding of speakers
Off-Site Educational Activities	3	The provided policy effectively prevents industry from funding individuals for travel to and registration at off-site educational conferences. The policy requires that industry support be directed to the conference sponsor in order to defray the costs for all
Scholarships and Grants	3	Industry may make scholarships available for students and trainees, but the recipients must be selected by the institution.
Curriculum	1	No policy or policy not provided
Oversight	Y	The institution has designated responsibly for enforcement in its policies.
Enforcement Y		Sanctions referenced

University of Louisville School of Medicine

Grade	B	The institution has created a set of policies that addresses conflict of interest in the majority of the domains on which it was scored. The institution has made educating students on the marketing influence of industry a priority, but it has not provided any policy to specifically regulate industry scholarships and funds for trainees. While the total gifts ban is excellent and the proposed samples voucher program is promising, the language in other domains has the potential to be stronger.
Gifts and Meals	3	Vendors may not provide gifts of any form or value to staff or students.

Consulting	2	For services off-campus, such as consulting, faculty and staff may not receive payments above fair market value. Research relationships between vendors and staff are more regulated.
Speaking	1	The institution strongly discourages paid lectureships, but no approval or limitation of speaking relationships is required.
Disclosure	2	Faculty and staff are required to disclose conflicts of interest their superiors as they occur.
Samples	1	Each department will outline the list of acceptable sample medications in its formulary. A samples voucher plan is being developed with area pharmacies.
Purchasing and Formulary	3	P&T members must recuse themselves from any decisions in cases where they are conflicted.
Industry Sales Reps	2	Industry representatives must have an appointment scheduled in advance. The policy also places other restrictions on the purposes of appointments with faculty and staff.
On-Site Educational Activities	2	Vendors may make educational grants, but may not select presenters or require inclusion or exclusion of specific medications in the program.
Off-Site Educational Activities	2	The receipt of gifts and payments for attending off-site educational events is banned. However, the acceptance of grants and scholarships for off-site educational events is not specifically addressed in the policies provided.
Scholarships and Grants	1	The institution provided no policy specific to scholarships or other support for students or trainees
Curriculum	3	Schools and departments will develop education programs on vendor marketing and influences on physician decisions.
Oversight Y		Oversight established
Enforcement Y		Specific sanctions referenced

University of Maryland School of Medicine

Grade	D	Few of the evaluated conflicts of interest domains were addressed by the University of Maryland School of Medicine policy. The policy is weakest in the areas of professional educational activities and funding for trainees, which are unregulated according to the provided policies. University of Maryland School of Medicine is progressive in that it requires approval for all outside professional activities, but the school has not taken steps to outline unambiguously which types of outside professional activities are permitted and which are not.
Gifts and Meals	1	A ban on solicitation and acceptance of gifts and honoraria was referenced but not provided.
Consulting	2	Faculty at the School of Medicine are required to have outside professional activities pre-approved.
Speaking	2	Faculty are required to have outside professional activities pre-approved.
Disclosure	2	The School of Medicine requires internal disclosure of outside professional activities.
Samples	1	The School of Medicine does have a supplier's policy, but does not restrict the use of samples as a marketing tool in any significant way.
Purchasing and Formulary	2	Members of the pharmacy and therapeutics committee are required to disclose all financial relationships under the provision for general disclosure.
Industry Sales Reps	2	Industry representatives must have a scheduled meeting in order to be on School of Medicine property.
On-Site Educational Activities	1	No policy, or policy not provided.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	The School of Medicine indicates that industry marketing and conflicts of interest are covered in its curriculum, but did not provide any examples or further details on the curriculum.
Oversight	N	No established body for oversight. (Policy only lists Board of Regents as recipient of reports for disclosure.)

Enforcement	N	Apart from penalties that may be associated with the state disclosure law, no specific sanctions for non-compliance with School of Medicine policies are given.
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University of Massachusetts Medical School

Grade	A	A reassessment has been completed. After the provision of an additional policy, this institution has moved from a 2 to a 3 for Consulting Relationships, and from a 1 to a 2 in Disclosure. Their grade has moved from a B to an A. Clear, model language throughout is a hallmark of University of Massachusetts Medical School's policy on industry interactions, which has been approved with a target implementation date of July 1, 2008. The Medical School supports this strong policy with a lucid and practical frequently asked questions document. University of Massachusetts Medical School submitted additional policies on June 3rd, 2008, and are currently being reassessed.
Gifts and Meals	3	Meals on and off-campus, as well as all gifts are prohibited. Noteworthy: the Medical School will engage in an input and education process to phase in gifts policy for all medical staff.
Consulting	3	Consulting arrangements require a written agreement with specific and substantive deliverables, and further all consulting arrangements must be disclosed to the medical school for review. The Medical School has also restricted these relationships by providing a list of services that are legitimate: <ol style="list-style-type: none"> 1. Design of a new clinical trial or conduct or an existing clinical trial with which the institution is involved; 2. Development of a new diagnostic, therapeutic, or technical product; or 3. Development of an educational product. Consulting with marketing aims is specifically prohibited.
Speaking 3		Model language: "...clinical employees including physicians may not serve as members of any vendor speakers' bureau. If such individuals are bound by an existing formal contract," they must not renew or extend it. The Medical School also requires all compensated speaking relationships be disclosed for review.
Disclosure	2	All medical school professors and associate professors (as well as all department heads, chairs, officers and board members) must disclose upon hiring (and annually thereafter) external financial relationships including but not limited to: research activities, clinical activities, technology related activities, scholarly activities, outside business activities, outside consulting & other relationships with industry.
Samples	2	"All drug samples must be delivered to and remain under control of the Medical Center's Pharmacy," breaking the marketing link between detailer and clinician.
Purchasing and Formulary	3	Strong language: "The Medical Center's Pharmacy and Therapeutics Committee and Device Procurement Committees should consist of members with no financial relationships with manufacturers, including gifts, grants, consulting, or other contracts," resulting in the potential exclusion of some current members and implementation of a disclosure process that is not expanded on elsewhere.
Industry Sales Reps	2	Vendors are allowed only in non-patient care areas and only by appointment.
On-Site Educational Activities	3	Noteworthy: "An oversight committee of rotating physician leaders will review and oversee industry sponsorship exceeding established thresholds (i.e.: \$10,000) to assess potential conflicts of interest."
Off-Site Educational Activities	3	"No honoraria, travel or lodging cost may be covered if the employee is simply attending" an educational conference.
Scholarships and Grants	3	The foundation or clinical department selects the recipient of the scholarship or funds, and the activity must be deemed to have educational merit.
Curriculum	1	No curriculum component of policy provided.
Oversight	N	A party responsible for oversight is not established in this policy.
Enforcement N		This policy does not make reference to sanctions.

University of Medicine and Dentistry New Jersey - New Jersey Medical School

Grade **F** This institution has not responded to AMSA's request for policies.

University of Medicine and Dentistry of New Jersey - Robert Wood Johnson Medical School

Grade	D	A code of ethics and institutional guidelines on research-based conflicts of interest was submitted by the University of Medicine and Dentistry of New Jersey. However, other than gifts and perhaps consulting relationships (depending on institutional interpretation), the code does not address any of the domains with enough specificity to represent meaningful limits on medical conflicts of interest with pharmaceutical vendors.
Gifts and Meals	1	An otherwise good gifts policy is weakened by a provision for reasonable inference of influence. According to this policy, personnel may not accept gifts when it can be "reasonably inferred that such gifts, services, or other thing of value [were] given or offered for the purpose of influencing him or her in the discharge of his or her official duties." This introduces a very subjective element into gifts regulation. Not only could this allow for increased gift acceptance (considering the cognitive dissonance of the gift recipient), it also places a greater burden of compliance on the recipient by requiring repeated subjective decisions. In addition, the institution does not regulate industry-provided on-site meals.
Consulting	1	This policy refers to an Outside Employment policy that was not provided or available on the website (which notes it is under revision).
Speaking	1	This policy refers to an Outside Employment policy that was not provided or available on the website (which notes it is under revision).
Disclosure	2	This policy requires prompt and written disclosure of all conflicts and potential conflicts as they occur.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	2	Personnel are not permitted to act in their official capacities (understood to include purchasing and formulary committee appointments) when they have external financial conflicts which might be expected to impair his or her objectivity or independence of judgment. The addition of the subjective <<reasonable expectation>> provision prevents this policy from receiving the highest score.
Industry Sales Reps	1	No policy, or policy not provided.
On-Site Educational Activities	1	No policy, or policy not provided.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	No policy, or policy not provided.
Oversight	Y	These policies establish oversight,
Enforcement	N	These policies do not establish sanctions.

University of Medicine and Dentistry of New Jersey – School of Osteopathic Medicine

Grade **I** This institution has indicated it is currently revising its policies.

University of Michigan Medical School

Grade	B	The University of Michigan Medical School has a strong ban on gifts and samples, a comprehensive disclosure system, and evidence of a curriculum that makes pharmaceutical COI a priority from the beginning of medical training. Industry influence of on- and off-site education does not seem well-regulated. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	2	All meals, personal, and promotional (branded) gifts banned to faculty, staff, trainees and students. However, the policy seems to permit gifts of an educational nature which, although unbranded, may still affect prescribing behavior.
Consulting	2	Department chairs, deans, and appropriate managers are given the authority to approve/disapprove of all conflicts of interest or commitment, which must be disclosed annually and updated as they occur.

Speaking	2	Dept. chairs, deans, and appropriate managers are given the authority to approve/disapprove of all conflicts of interest or commitment, which must be disclosed annually and updated as they occur.
Disclosure	2	Annual and as-needed disclosure of all conflicts of interest and commitment required for all staff, faculty, students, and trainees of the University of Michigan Medical School.
Samples	3	The Medical School institutes model language on samples. The policy acknowledges that samples are primarily marketing tools for the drug industry and bans them as such, with a narrow exception for special circumstances, which may be petitioned to the Ambulatory Formulary Committee and Site Medical Director. Further, recognizing their functions of convenience and value to patients, the institution distributes pharmaceutical vouchers through Pharmacy Services for complimentary starter medications of formulary drugs at a patient's chosen pharmacy - breaking the link between sales representatives and physicians, as well as eliminating the safety risks inherent with unregulated sample distribution.
Purchasing and Formulary	3	The institution establishes a choice of methods for mitigating conflict of interest in committee decisions, but all require that the individual with conflict recuse him or herself from voting.
Industry Sales Reps	2	Vendors are allowed on campus by appt, but are restricted to non-patient care areas except for device and product training, and then only with approval.
On-Site Educational Activities	2	The Medical School adheres to ACCME standards cited for CME-credit events on-site.
Off-Site Educational Activities	2	The gifts/meals ban covers gifts and meals for off-site events, but it is not clear from policies provided whether travel and attendance costs are covered by it, as well.
Scholarships and Grants	1	The Medical School indicates that a new policy on scholarship/trainee funds is in development.
Curriculum	3	The Medical School provided materials for course curriculum, "Drug Development, Marketing and Industry Relationships" for first and second year medical students.
Oversight Y		Oversight mechanisms are well established in this policy.
Enforcement	Y	Sanctions are well established in this policy.

University of Minnesota Medical School

Grade	D	The policies of University of Minnesota Medical School address faculty in the consulting, speaking, and disclosure domains but do not adequately address gifts, education, and student/faculty interaction with industry representatives. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	1	The Medical School relies solely on the AMA gift policy for students/trainees, which does not substantially reduce gifting. No policy for faculty has been provided.
Consulting	1	Most, but not all, consulting relationships require review only; those that exceed a time commitment threshold require prior supervisory approval.
Speaking	2	Though participation in occasional speaking relationships is permitted without requirement for disclosure, prior approval is required for faculty and staff whose outside commitments that take more than one day per month.
Disclosure	2	Annual disclosure is required of all paid academic employees.
Samples	1	No policy, or policy not provided.
Purchasing and Formulary	3	Individuals with business/financial interests who are involved in any committee or review must disclose to committee chair and excuse themselves from all deliberations involving said interest.
Industry Sales Reps	N/A	Industry sales representatives do not visit the Medical School.
On-Site Educational Activities	2	The Office of Continuing Medical Education adheres to ACCME standards for commercial support.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	Industry support for scholarships is not clearly addressed in provided policy.
Curriculum	1	No curriculum content provided.

Oversight Y	Oversight established in this policy.
Enforcement	Y Sanctions referenced in policy.

University of Mississippi School of Medicine

Grade	C	This school has strong policy language in consulting, speaking, and purchasing domains. Its gifts policy allows gifts under \$50 value with a \$300/year limit, which falls considerably short of the recommended "no gifts" policy. Addressing medical students' industry interaction by developing a scholarship and curriculum component would strengthen this score. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	2	This policy bans gifts of value greater than \$50 per time or \$300 per year, which is more extensive than the PhRMA code.
Consulting	2	Those wishing to consult must put arrangements in a formal contract, with identified and legitimate services, and compensation of fair market value.
Speaking	2	In a cautionary note, this policy states: "Caution: Speakers should ensure that the terms of the arrangements are set in advance and set forth in writing and must be pre-approved by the Office of Compliance." Further limits on duration of such arrangements would improve this school's score.
Disclosure	2	"Employees and academic/clinical units will report conflicts of interest and significant financial interests annually."
Samples	1	No policy or policy not provided
Purchasing and Formulary	3	Those who are involved in institutional decisions regarding the purchase or approval of medical or equipments "must not have any financial interest...in the companies that might benefit from the institutional decision."
Industry Sales Reps	2	Vendors must have an appointment and may not enter patient care areas when visiting the institution.
On-Site Educational Activities	2	Both accredited and unaccredited educational events must follow ACCME standards for commercial support.
Off-Site Educational Activities	3	Travel support may only be provided by industry for medical technology trainings or IRB-approved research. Travel support must be approved by office of compliance.
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight Y	Oversight referenced	
Enforcement Y	Sanctions referenced	

University of Missouri at Kansas City School of Medicine

Grade	B	The institution has advanced new conflict of interest policies that are ambitious in some of the domains on which they were scored, including a total ban on gifts and meals. The institution has generally strong policies in other areas, but places few requirements on faculty to disclose and manage conflicts and business interests under a certain threshold. The institution has not indicated a mechanism for active oversight and enforcement of these policies.
Gifts and Meals	3	All gifts, services and meals from industry representatives are banned.
Consulting	2	Faculty may consult for the external community. In some cases in which the work overlaps with that of university teaching and/or research permission is required. However It is not clear that all consulting agreements must be described in formal contract or that pay must be commensurate to the task.
Speaking	1	No policy provided.
Disclosure	1	Disclosure policies only cover those involved in research and those making purchasing decisions. For the latter, only significant financial intereste (greater than \$10,000) are required
Samples	2	Samples and vouchers may only be accepted and dispensed by the pharmacy department. Only at outreach clinics, where no institutional pharmacy is located nearby, physicians may accept samples directly.

Purchasing and Formulary	2	Pharmacy and therapeutics committee members must disclose only significant financial relationships (usually of \$10,000 or more) to the committee. The member must not participate in the discussion and voting if he or she has a significant conflict with the manufacturer of the product being discussed.
Industry Sales Reps	2	Pharmaceutical industry representatives may only be present in non clinical areas after paying an annual fee and receiving a name badge for each visit.
On-Site Educational Activities	3	On-site education programs must adhere to ACCME standards, whether or not CME credit is awarded. Further, commercial interests may not control the planning, content or execution of the activity.
Off-Site Educational Activities	2	Gifts and travel support for off-site event attendance are explicitly banned.
Scholarships and Grants	3	Industry may provide scholarships as long as the selection of recipients is controlled by institution
Curriculum	2	All covered persons receive training on conflicts of interest and interactions with industry, although it is not part of the curriculum.
Oversight	N	There is no mechanism for oversight and compliance
Enforcement	N	There are no clear sanctions for non-compliance

University of Missouri-Columbia School of Medicine

Grade	C	This institution's policies are broadly applicable to the medical school "workforce" (all faculty, students, residents, etc.). This institution has focused on thorough disclosure processes and restricting industry representative conduct. This institution has not put forth any policy restricting use of samples or provided information on conflicts of interest and drug industry marketing's place in its curriculum, but is ahead of the curve in that it requires institutional approval in order for workforce members to receive funding for attendance at off-site educational conferences.
Gifts and Meals	2	The institution puts \$5 per item and \$75 annual limit on gifts per vendor per workforce member. It also cites AMA recommendations on gifts.
Consulting	2	Prior approval from Dean for consulting relationships is required
Speaking	2	Compensation for speaking services provided on personal time must be reasonable, and lecture content should be determined by the speaker, not industry sponsor.
Disclosure	2	The completion of an Outside Interest Report is required of those who have real or the appearance of a financial conflict of interest for the University although it is not clear if the document to be filled out is required annually or as needed. The SOM has a separate annual disclosure required for all workforce members.
Samples	1	No policy or policy not provided
Purchasing and Formulary	2	Disclosure of potential conflicts to the committee is required.
Industry Sales Reps	2	The institution requires industry representatives to complete an orientation/code of conduct in-service before meeting with staff and categorizing them as "Non-Clinical" or "Clinical" representatives. All representatives are required to have scheduled appointments with staff and there are significant restrictions placed on their activities on campus.
On-Site Educational Activities	2	Industry funds must pass through an institutional gift account. Educational content is then limited by institutional policy, and financial support for CME events must be fully disclosed.
Off-Site Educational Activities	3	Individuals may not be compensated for event attendance. Approval is required for travel support.
Scholarships and Grants	3	Institutional policy prevents industry from selecting the recipient of funding and scholarships.
Curriculum	1	No policy or policy not provided
Oversight	Y	The Compliance Review Committee is cited as the responsible party for review disclosed conflicts of interest and making determinations on necessary corrective actions.
Enforcement	N	Sanctions not referenced.

University of Nebraska College of Medicine

Grade	I	Grade: D Complete policies are still in formation, but this institution has provided certain materials for provisional assessment while they await final approval. By requiring that most consulting relationships be approved in advance, which would limit the most egregious industry relationships and positions with outside companies, this institution has gone further than many. The institution has also enacted a ban on gifts and food from vendors with the relatively low threshold of \$25. It has, however, not placed any restrictions on speaking engagements and has advanced less stringent policies in most other domains. There is an opportunity for the institution to clarify and strengthen its policy on conflicts of interest education for trainees, which is somewhat ambiguous and largely left up to each department. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	2	The institution has put a \$25 limit on accepting or seeking anything of value from vendors. This policy would eliminate certain industry-funded meals and gifts, but many branded items are still permitted.
Consulting	2	The institution requires that faculty seek approval from department chairs in order to enter outside consulting relationships and engage in other outside professional activities. Specific criteria for approval, beyond a general time limit of two working days per month, were not provided for consulting relationships.
Speaking	2	This institution requires faculty to obtain approval before engaging in speaking only relationships that are more than temporary or occasional, but clearly states that one-time speaking engagements are not subject to prior approval.
Disclosure	1	Disclosure only referenced for publication, speaking, and participation in institutional decisions. No requirement for all-employee disclosure.
Samples	1	Samples policy referenced but not provided.
Purchasing and Formulary	2	Committee members must disclose their conflicts and potential conflicts to the other committee members or purchasing unit.
Industry Sales Reps	1	This policy names certain situations where vendor access is approved: where Industry representatives receive prior approval and have an appointment with a medical school staff member; where industry representatives are attending an in-service training; or where representatives are attending a UNCOM-initiated educational event. It is not clear whether appointments are necessary for every meeting, or whether the policy allows standing approval for "drop-in" vendor meetings with doctors.
On-Site Educational Activities	1	The institution has not provided any language specific to its on-site CME programs, beyond citing a requirement that speakers disclose their real and potential conflicts of interest. In general, educational grants should be given to departments rather than individuals, but no central fund has been established.
Off-Site Educational Activities	3	The institution cites the Federal Anti-Kickback statute as the basis for its policy prohibiting the receipt of funds from industry for attendance at conferences or meetings at which the attendee is providing no service. Funds provided for travel are subject to institutional approval.
Scholarships and Grants	1	Although this policy prohibits direct receipt of scholarships by trainees, it does not specify that such regulation covers students.
Curriculum	2	The institution has laid out plans to create a program to provide training on conflicts of interest related to interactions with industry, leaving each department or programs responsible for the specific content and frequency of the trainings.
Oversight	Y	Each department chairperson is responsible for oversight.
Enforcement	N	Sanctions not referenced

University of Nevada School of Medicine

Grade	F	The University of Nevada School of Medicine declined to participate in AMSA Pharm-Free Scorecard 2008.
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University of New England College of Osteopathic Medicine

Grade	F	Though it provided policies for institutional conflicts of interest (IP, research funding, etc) this institution has not provided policies in most of the assessed domains relating to individual COI and industry marketing. The consulting policy seems to rely on self-regulation, and faculty members are held to the university's wider annual disclosure policy. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.
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Gifts and Meals	1	No policy or policy not provided
Consulting	1	This policy indicates that consulting agreements will be self-managed by the faculty.
Speaking	1	No policy or policy not provided
Disclosure	1	This annual disclosure policy begins at a \$10,000.
Samples	1	No policy or policy not provided
Purchasing and Formulary	1	This policy's \$10,000 disclosure floor means that some P and T committee members may not be required to disclose their potential conflicts of interest.
Industry Sales Reps	1	No policy or policy not provided
On-Site Educational Activities	1	No policy or policy not provided
Off-Site Educational Activities	1	No policy or policy not provided
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	This policy references oversight.
Enforcement Y		This policy references sanctions.

University of New Mexico School of Medicine

Grade	B	An exemplary policy for gifts that phases out industry-supported meals over three years acknowledges one of the more challenging components of a policy overhaul. University of New Mexico School of Medicine policies for on- and off-site education are strong, as are those requiring recusal of conflicted members from purchasing decisions. There is no evidence to what extent this policy is reflected in the medical curriculum, which is another good way to achieve institutional support and buy-in. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	3	All personal gifts, as well as any items displaying logos are banned. Noteworthy: A three-year phase-out of industry support for meals helps departments transition to serving pharm-free fare.
Consulting	2	Consulting engagements must have only fair market compensation commensurate with legitimate services provided.
Speaking	2	Faculty/staff engaging in outside speaking engagements for industry must ensure the lecture's content is determined solely by him or herself, and shall receive reasonable compensation for legitimate services.
Disclosure	1	This policy makes reference to annual disclosure for those involved in research, but no general disclosure for staff.
Samples	2	A physician considering the use of samples must contact the Director of Pharmacy, a requirement which represents some limit on samples.
Purchasing and Formulary	3	Members of purchasing committees must disclose all potential conflicts of interest and recuse themselves from the process.
Industry Sales Reps	1	This policy makes reference to site access restrictions that are not provided.
On-Site Educational Activities	2	All educational events at the School of Medicine are subject to the ACCME standards for commercial support.
Off-Site Educational Activities	2	Policy restrictions for travel and other off-site compensation from industry apply only to trainees and students.
Scholarships and Grants	3	Industry may not play a role in choosing the recipients of scholarships for students or trainees.
Curriculum	1	No policy, or policy not provided.
Oversight	N	This policy does not establish a party responsible for oversight.
Enforcement N		This policy does not make reference to sanctions.

University of North Carolina - Chapel Hill School of Medicine

Grade	B	Inventive samples regulation is a hallmark of the conflicts of interest policies of University of North Carolina - Chapel Hill School of Medicine, which successfully address most of the scored domains. UNC - Chapel Hill assigns responsibility for oversight and enforcement of all sections of the policy document. What is missing from this set of policies is a set of student-specific guidelines, as the current policies are applicable only to staff. While the School of Medicine did communicate that there is a 4th year course in which medical students receive training relating to drug development, marketing and relationships with industry, the submission did not include any materials or a syllabus for the course.
Gifts and Meals	2	The School of Medicine prohibits the acceptance of personal gifts, cash, incentives or rebates by The institution staff and modest meals may be provided only in connection with educational events.
Consulting	3	School of Medicine staff may enter into contracts with vendors, but they must receive approval from the applicable department chair and complete an "External Professional Activities for Pay" form, which was not provided. The policy language implies a written contract is necessary.
Speaking	2	As with consulting, the School of Medicine requires pre-approval of all speaking relationships for which the speaker receives compensation.
Disclosure	1	No policy for general disclosure provided.
Samples	2	Although samples are not controlled as strictly as the scorecard recommends, this policy received credit for an inventive approach wherein one designee in each department receives samples for the entire department. If interpreted correctly, this effectively prevents a large portion of doctors from being detailed, but does address other ways in which samples affect prescriber behavior.
Purchasing and Formulary	3	A staff member is not permitted to participate in negotiations with vendors if that staff member has a financial interest with that vendor. Conflicted staff members are, however, permitted to provide professional advice to the selection team.
Industry Sales Reps	2	This policy bans vendors from the School of Medicine unless they have an appointment, and then only in non-patient areas.
On-Site Educational Activities	2	The School of Medicine regulates accredited events more extensively than it does non-accredited events, where industry sponsors are allowed to provide direct support. However the policy does require a centralized fund for CME monies, although it is not clear that monies are thus completely stripped from industry influence. This policy also stipulated that the elements of the event must be chosen by the School of Medicine.
Off-Site Educational Activities	3	This policy restricts cash payments, subsidies and rebates for travel in their gifts policy, but allows industry scholarships to educational conferences for staff if the recipient is chosen by the applicable department.
Scholarships and Grants	1	The School of Medicine provided no policy on scholarships and funds for trainees and students. The scholarship policy assessed in the Off-Site Education section does not apply to students, although it may apply to residents, whom the institution may consider to be staff.
Curriculum	1	The School of Medicine indicated that its curriculum contained content relating to drug development, marketing and relationships with industry, but provided no examples of this and did not include a statement regarding relevant curricular content in its policy.
Oversight	Y	The responsible party for oversight in each domain is set forth in the Enforcement section.
Enforcement	Y	This policy outlines possible sanctions for noncompliance.

University of North Dakota School of Medicine

Grade	F	This institution responded to the request for policies by noting it had no policies for any of the assessed domains. The institution also noted that it is a community-based medical school, and that students follow the policies at the hospital or clinical site to which they are assigned. It further noted, however, that the medical school should be looking at uniform policies for these issues.
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University of North Texas Health Science Center at Fort Worth - Texas College of Osteopathic Medicine

Grade	D	The institution provided policies that touch on many of the domains that were scored, but the policies are generally weak. Institutional policies would likely prevent many inappropriate relationships with industry through its consulting portion, which requires pre-approval and that pay be commensurate to the services provided. Beyond this, there is little in the policies that would reduce conflicts of interest.
Gifts and Meals	1	The institution requires gifts over \$250 be reported to the President.
Consulting	3	Employees must receive approval before engaging in outside professional activities such as consulting. In addition, pay must be commensurate to the task.
Speaking	2	The institution allows faculty to receive reimbursements for travel related to speaking engagements, but not to receive honoraria for those services.
Disclosure	1	There is no disclosure requirement that is applicable to all who may have conflicts. The institution does, however, have various disclosure requirements for subgroups at the institution, such as researchers and the President and Vice President.
Samples	1	No policy or policy not provided
Purchasing and Formulary	1	No policy or policy not provided
Industry Sales Reps	1	No policy or policy not provided
On-Site Educational Activities	1	ACCME guidelines were referenced, but only under a policy concerning disclosure. It is not clear that all on-site educational events are subject to ACCME or other guidelines.
Off-Site Educational Activities	1	The institution does not prevent the receipt of gifts for simply attending conferences or educational events.
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	The institution has not provided evidence of a curricular requirement covering conflict of interest and marketing by the pharmaceutical industry
Oversight	Y	There is a Conflicts of Interest Committee whose members are appointed annually by the institution President.
Enforcement	Y	Sanctions are outlined in the policies.

University of Oklahoma College of Medicine

Grade	D	An exceptional policy on speaking relationships establishes multiple restrictions to ensure that personnel acting as speakers are not presenting biased or industry-controlled information. Other well-intentioned generally are sufficient to effectively combat potential conflict of interest within industry/personnel interactions.
Gifts and Meals	2	This policy prohibits meals outside of educational events, but allows many kinds of small gifts. "Educational materials such as books and CDs and items related to clinical practice, such a stethoscopes, reference manuals, etc., may be accepted from vendors..."
Consulting	2	This policy does not mandate institutional oversight of consulting relationships, but states that payment should be appropriate. "Consultant fees may be accepted by residency faculty and staff for the provision of scientific, professional or educational expertise rendered to industry, but should be commensurate with the level of service provided."
Speaking	3	In several places, this institution's policy restricts employees from speaking in non-educational capacities and in circumstances that may compromise their standing as unbiased, professionals and state employees. "...employees [should] not agree to provide any professional services that compromise, appear to compromise, or have the potential to compromise or appear to compromise their professional judgment, research results, or the like."
Disclosure	1	This policy does not contain any general disclosure requirement, but refers to the Office of Research Administration (ORA), which must negotiate and authorize all educational speaking contracts. This implies a form of disclosure, but an effective policy must have some form of general disclosure applicable to all personnel, not only those in speaking relationships.

Samples	1	There are no significant restrictions on samples that would help prevent their influence on prescriber behavior. Restricting faculty and family personal use is not enough.
Purchasing and Formulary	1	No policy, or policy not included.
Industry Sales Reps	1	No policy, or policy not included.
On-Site Educational Activities	2	This policy does not mandate that all educational grants go to a central fund, but it does call for the grants to be unrestricted, requires adherence to ACCME standards when granting CME 1 credit and states that all events should present objective and balanced information. Dangerously, however, this policy permits the use of vendor-provided speaking materials which may greatly compromise educational objectivity.
Off-Site Educational Activities	2	Faculty, staff, and trainees are prohibited from accepting payment for attending events under the Gifts policy. However, scholarships for travel to trainings are permitted, and there is no provision preventing industry from selecting the recipients of those travel scholarships.
Scholarships and Grants	2	Scholarships seem to be implicitly limited to trainings on devices; however, there is no restriction on industry earmarking of funds.
Curriculum	1	This policy is "In development"
Oversight Y		
Enforcement	N	The only sanctions referenced in this policy apply to those who violate state conflict of interest rules around speaking relationships.

University of Pennsylvania School of Medicine

Grade	A	Model samples, scholarship and curriculum policies are the highlights. The University of Pennsylvania School of Medicine has provided excellent policies regulating pharmaceutical industry marketing, but does not go as far in addressing potential conflicts of interest among the institution staff. The fact that much of what the institution provided constituted guidelines, and the absence of specific enforcement mechanisms listed, is concerning.
Gifts and Meals	2	The School of Medicine has banned completely gifts and meals provided directly by pharmaceutical representatives, although indirect funding of meals is permitted.
Consulting	2	Professionals at the School of Medicine may consult on their "1 day in 7" time if the payments received are reasonable for the services provided.
Speaking	2	Professionals at the School of Medicine may consult (including providing presentations) on their "1 day in 7" time if the payments received are reasonable for the services provided.
Disclosure	1	The School of Medicine provided no disclosure policy.
Samples	3	Model samples policy: "No physical medication samples are allowed within the institution and the institution practices. The distribution of sample medication vouchers in inpatient areas is prohibited." The School of Medicine also has a detailed policy on its voucher program for indigent medications and starter packs.
Purchasing and Formulary	3	Faculty members with financial conflicts of interest are forbidden from serving on purchasing committees.
Industry Sales Reps	2	The School of Medicine requires pharmaceutical representatives to register once with the institution, and must have an appointment before being permitted on site. In addition, representatives may only conduct meetings in private offices and may not attend any conferences or reports. "Pharmaceutical company representatives are expected to communicate warnings and contraindications with the same fervor with which they promote indications and endorsements of medical experts."
On-Site Educational Activities	2	This policy does not stipulate a truly anonymized central fund for unrestricted grants, but it does allow for institutional control/approval of content, and non-CME educational events given by industry must not discuss non-formulary drugs.
Off-Site Educational Activities	3	According to this policy, reimbursement for travel and other funds related to off-site education may only be provided by industry through unrestricted educational grants. Industry may not select the recipient of these grants.
Scholarships and Grants	3	Model policy: "In the case of professionals-in-training or other trainees, conference funds may be donated to a clinical department/division, provided that department faculty (and not the company) chooses the trainee to receive the funds for attending the meeting."

Curriculum	3	Model language: "With regard to physicians-in-training, departmental curricula will include discussion and reflection on managing encounters with Industry representatives, and house staff should be instructed on how promotional activities may influence judgment in prescribing decisions and research activities."
Oversight	Y	Various named parties are responsible for the implementation of the guidelines given.
Enforcement	N	Possible sanctions for non-compliance with the guidelines were not provided.

University of Pittsburgh Medical Center

Grade	A	Exemplary. University of Pittsburgh Medical Center has implemented a set of some of the most ambitious conflicts of interest policies in the country. The policies are written clearly and unambiguously, and in many cases include a short preamble that outlines the reasoning for, and spirit of, each policy. The one area for which no policy was provided is curriculum content on industry interactions portion; UPMC has indicated a separate working group is addressing this issue.
Gifts and Meals	3	UPMC has banned all personal gifts, regardless of the nature or dollar value of the gift. Additionally, the institution has banned on-site and off-site staff meals that are directly funded by industry.
Consulting	3	UPMC has a model consulting policy: "In order to avoid gifts disguised as consulting contracts, where SOHS or UPMC personnel have been engaged by Industry to provide consulting services, the consulting contract must provide specific tasks and deliverables, with payment commensurate with the tasks assigned. All such arrangements between individuals or units and outside commercial interests must be reviewed and approved prior to initiation in accordance with appropriate University or UPMC policies."
Speaking	3	There are approval requirements and specific limits on duration and payments, as well as a demonstrated understanding of the potential for and frequency of inappropriate speaking relationships. Would almost certainly prevent long-term speaking relationships.
Disclosure	2	Internal disclosure of all industry relationships is required annually and as needed when new relationships arise.
Samples	3	This institution is implementing a centralized sample medication system that removes the interaction between prescribers and vendors
Purchasing and Formulary	3	Model language: "No member of a purchasing unit should serve in any capacity in any other organization where his or her judgment regarding University affairs may be influenced by concern for the success of the outside enterprise."
Industry Sales Reps	2	Industry representatives must be invited by a health care provider for a specific purpose in order to enter the institution.
On-Site Educational Activities	3	UPMC mandates that all funds for educational events be centralized through the Center for Continuing Education on Health Sciences, and requires all centralized funds be independent of industry control.
Off-Site Educational Activities	3	UPMC does not allow industry to pay travel expenses or reimbursement for attendance at off-site educational events or meetings
Scholarships and Grants	3	Students may receive scholarship or other industry funding, but such funds must go into a centralized pool, and no earmarking is permitted.
Curriculum	1	UPMC indicated that there is a separate working group considering the curriculum.
Oversight	Y	Responsibility for oversight and compliance is clearly outlined in the policies.
Enforcement	Y	A list of possible sanctions for noncompliance are given.

University of Puerto Rico School of Medicine


Grade	F	This institution responded to the request for policies by noting they had no policies for any of the assessed domains.
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University of Rochester Medical Center School of Medicine


Grade	C	This policy's recent updates include a good annual disclosure requirement. The institution also has policies that are strong on curriculum, scholarship, and have seriously addressed the issue of pharmaceutical influence on medical education in its preamble and explanatory text. A working group has been established to consider how to handle pharmaceutical samples, and the policy lays out several different options for reducing their power as marketing tools. A strong samples policy will raise this institution's score.
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Gifts and Meals	2	Although some policy language states that "personnel may not accept gifts from industry", other language states 'Certain gifts directed at patients are permitted, but only if the cost of such items is modest (less than \$100) and if such items are only occasionally provided'. We understand this to mean that gifts "for the benefit of the patient" or potentially educational gifts are allowed, thus this policy does not stipulate a complete ban on gifts.
Consulting	1	Though this policy discusses the possibility of influence in consulting relationships, no policy limits made.
Speaking	1	Speaking engagements are excluded from interests that need to be disclosed at the institution
Disclosure	2	Annual disclosure required of all faculty within 60 days of hire and then annually thereafter.
Samples	1	Samples are permitted, according to patient-benefit gifts clause.
Purchasing and Formulary	2	Members of purchasing/formulary required to disclose all potential conflicts, and other members shall decide whether that person will recuse themselves.
Industry Sales Reps	2	Industry representatives are allowed on campus only by appointment, and only in non patient care areas.
On-Site Educational Activities	2	Contribution are required to be made to a central fund for private educational activities, but industry funds may be administered by center, division, or dept. for educational events sponsored by the institution.
Off-Site Educational Activities	2	"Personnel may attend non-AMC off-site or out-of-town conferences with meals provided by Industry as long as the talk...adheres to ACCME or equivalent requirements," but may not directly accept compensation for such attendance. Despite these requirements, no institutional review of travel awards or firewall preventing industry from selecting recipients exists.
Scholarships and Grants	3	Provision of scholarships by industry acceptable as long as the institution selects the recipient.
Curriculum	3	Detailed curricular material attached.
Oversight	Y	"School deans or University counterparts, or their designees, are responsible for ensuring implementation of these policies..."
Enforcement Y		This policy references sanctions


University of South Alabama - College of Medicine

Grade  This institution submitted new policies for review, but time was not sufficient to adjust its score pre-release. This in-process designation will remain in place until the score has been reassessed - a maximum of 60 days.


University of South Carolina School of Medicine

Grade  This institution has not responded to AMSA's request for policies.


University of South Dakota Sanford School of Medicine

Grade  The institution responded to the policy request, but noted that it had no policy for any of the domains.


University of South Florida College of Medicine

Grade  This institution submitted a response to the AMSA Pharm-Free Scorecard. Unfortunately the response was lost in the mail. AMSA has re-requested a response, and will assess this institution as soon as that response is received.

University of Tennessee College of Medicine - Memphis

Grade  The University of Tennessee College of Medicine, Memphis policies are in draft form, and so College administrators elected not to submit them for review.

University of Texas Health Science Center at Houston

Grade  This institution is currently revising its policies.

University of Texas Health Science Center at San Antonio - School of Medicine

Grade		
	C	This policy has a strong and simple gifts and meals ban, as well as good limits on industry influence in scholarships and off-site education. Importantly, the Health Science Center unambiguously excludes members with conflicts from purchasing committee decisions. However the policy is silent on site access and weak on samples, which clinicians are permitted to accept directly from sales reps. This policy is useful in that it makes explicit that the rules govern faculty and staff practicing at affiliated clinics, but that the strongest policy shall preside in any case when policies between the Health Sciences Center and clinic differ.
Gifts and Meals	3	Simple, clear gift and on-site meal ban.
Consulting	2	This policy stipulates that a contract is required for consulting relationships, which must be compensated at fair market value for legitimate services.
Speaking	1	No policy provided.
Disclosure	2	Annual disclosure of all financial interests required of all Health Science Center clinicians.
Samples	1	"...clinicians may accept free drug device, or other product samples from industry only for distribution to patients." As such, this policy does not make meaningful limits on samples as a marketing tool.
Purchasing and Formulary	3	Committee members involved in purchasing decisions "must not have any financial or personal interest in companies or their employees that might benefit from the institutional decision."
Industry Sales Reps	1	No policy provided
On-Site Educational Activities	2	The policy cites adherence to ACCME standards for all educational events, accredited or otherwise.
Off-Site Educational Activities	3	The policy prohibits payment for attendance at off-site educational events, as well as travel support for attendance at such events.
Scholarships and Grants	3	The trainee selected for an industry scholarship must be chosen by the Health Science Center School Dept. Division or Program.
Curriculum	1	No policy component currently addresses curriculum, but school indicates that curricular material will be available and implemented in 2008-2009 academic year.
Oversight	N	No oversight body referenced
Enforcement Y		Sanctions referenced

University of Texas Medical Branch at Galveston

Grade		
	A	This institution has adopted a consulting policy stronger than most, as well as a thorough purchasing and formularies and gifts policy. The institution bans samples in its clinics with rare exceptions, such as injectable drugs, an important curb on pharmaceutical marketing. Administrators would do well to integrate these already-strong policies into the medical school curriculum. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	3	Gifts and on-campus meals are banned with the exception of those provided during approved educational activities.
Consulting	3	Consulting agreements must be in writing, with reasonable fair market compensation for legitimate services, and must have prior institutional approval.
Speaking	2	Speaking engagements require prior institutional approval.
Disclosure	2	All faculty staff engaged in research must annually disclose all conflicts to the university.
Samples	3	"With rare exceptions, product samples may not be left by vendor representatives in any inpatient or outpatient clinical area. Rare exceptions to this provision (e.g. some injectable drugs, HIV drugs) may be authorized under limited circumstances for good cause" but those must be authorized by Chief Medical Officer. We have interpreted "left by vendor" to mean that samples could not be given to physicians, either.
Purchasing and Formulary	3	Those making purchasing decisions are barred from having financial or other conflicts of interest in companies that may be affected by such decisions.
Industry Sales Reps	2	Vendors must have appointment and are prohibited from patient care areas.
On-Site Educational Activities	2	No central fund or institutional approval of industry participation, but the policy does require adherence to ACCME standards for all on campus educational events.

Off-Site Educational Activities	3	Travel and other compensation to outside events prohibited. It should be noted, however, that acceptance of de minimis gifts at off-campus events explicitly allowed, perpetuating the inappropriate effects gifts may have on prescribing.
Scholarships and Grants	3	The scholarship policy requires faculty to select trainee recipients, and prohibits quid pro quo for selection.
Curriculum	1	No curricular content provided, though medical school notes that the industry is not involved in curricular design or implementation.
Oversight	Y	Conflict of interest committee has oversight.
Enforcement	Y	Clear sanctions delineated within policy.

University of Texas Southwestern Medical School

Grade	B	With the exceptions of a weak samples policy and a lack of focused training on conflicts of interest in its curriculum, the University of Texas Southwestern School Of Medicine has taken significant steps towards reducing the harmful impact of industry marketing efforts on its staff and students.
Gifts and Meals	2	The Medical School gifts policy sets a \$50/year limit on personal gifts from those who are promoting products for sale. While this leaves room for those gifts that are considered professional and educational products, the policy clearly states that meals and services are considered personal gifts.
Consulting	3	The Medical School requires pre-approval of any outside consulting arrangements by faculty.
Speaking	2	Medical school faculty may only deliver presentations at meetings and conferences that are directly or indirectly industry-sponsored if the activity adheres to all ACCME guidelines.
Disclosure	2	Annual disclosure of all actual and potential conflicts of interest to the University's Conflict of Interest Office is required.
Samples	1	The only restriction the Medical School places on samples is that they not be used by physicians for themselves or their family members.
Purchasing and Formulary	3	This policy seems to prevent individuals from participating in decisions concerning outside entities with which they have a financial conflict of interest. "Individuals must disclose their actual and potential conflicts of interest related to any institutional deliberations and generally may not participate in deliberations in which he or she has an actual or potential conflict of interest."
Industry Sales Reps	2	Vendors must have an appointment in order to meet with faculty or staff and meetings are limited to non-patient areas. In addition, vendors are explicitly forbidden from contacting trainees without going through the training director and receiving approval of any educational materials for distribution.
On-Site Educational Activities	2	The Medical School requires that all on-site educational activities adhere to ACCME guidelines.
Off-Site Educational Activities	3	Conference and meeting participants may not accept any subsidies or compensation for attendance. Travel support is not specifically referenced, but is understood to be covered by the prohibition on "subsidies" or "compensation" for attendance.
Scholarships and Grants	3	The Medical School permits industry funding and scholarships for trainees if the funds are provided to the department or program, the funded program or conference has educational merit, and the medical school program or department selects the recipient.
Curriculum	1	The Medical School did not provide any specific information about how conflicts of interest caused by industry marketing are addressed in its curriculum.
Oversight	Y	Oversight is established in the disclosure and consulting portions of the policy.
Enforcement	N	Sanctions only listed in research section, and are not considered applicable to assessed domains.

University of Toledo College of Medicine

Grade	D	The conflicts of interest policies for the University of Toledo College of Medicine provide little strong language in the scored domains. While the policies are weak and there is no clear mechanism for enforcement and oversight, the College reports that it has a curriculum that clearly address the link between industry promotion and conflicts of interest. Also of note, the policies require industry representatives who wish to work on College of Medicine premises to complete a two-hour class on relations between industry and students and residents.
Gifts and Meals	2	All gifts by industry are completely banned, and meals are restricted.

Consulting	1	No policy, or policy not provided.
Speaking	1	No policy, or policy not provided.
Disclosure	1	No policy, or policy not provided.
Samples	1	This samples policy is focused on proper storage and dispensing of sample medications, with no clear limitations preventing the use of samples as a marketing tool.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	2	Pharmaceutical representatives are not allowed in in-patient areas, direct patient care areas, or in the pharmacy department, and must have an appointment or invitation to access other areas of hospitals and clinics.
On-Site Educational Activities	2	Funds for CME events and educational activities must go through the CME office or department. The funds will be used as deemed appropriate by the CME office or department.
Off-Site Educational Activities	1	No policy, or policy not provided.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	3	The College's pertinent curriculum includes evidence-based medicine education and interactive training that addresses conflicts of interest in industry promotion to health care workers.
Oversight	Y	Responsible agents for the policy are listed.
Enforcement	N	Sanctions are not referenced.

University of Utah School of Medicine

Grade | Policies are in-process, and will be sent once finalized.

University of Vermont College of Medicine

Grade	C	University of Vermont College of Medicine has produced a set of policies that are mainly consistent with guidelines put forth by the ACCME. In most domains, the guidelines will somewhat limit the potential for conflicts of interest. Exceptions to this are a complete ban on gifts, and strong policies concerning off-site events and scholarships/trainee funds.
Gifts and Meals	3	This policy bans all gifts at University facilities or in connection with College events or activities, and explicitly bans all on-campus meals and food directly funded by industry.
Consulting 1		Outside consulting relationships are not addressed by this policy.
Speaking	2	This policy places some guidelines on speaking at industry-sponsored events that make it clear that the speaker should determine his/her own lecture content and provide fair and balanced information.
Disclosure	1	Disclosure of financial interests with industry is required in some circumstances, but is limited to those serving on formulary committees and ACCME guidelines. There is no general disclosure required.
Samples	1	No policy related to pharmaceutical samples was provided.
Purchasing and Formulary	2	The College of Medicine requires disclosure for those making decisions on equipment or drug purchasing and allows the purchasing unity to require individuals to recuse themselves from such decision-making.
Industry Sales Reps	2	Sales and marketing representatives are limited to non-patient care areas by appointment only, unless providing in-service training on devices or other equipment.
On-Site Educational Activities	2	All educational events sponsored by the College must adhere to ACCME standards.
Off-Site Educational Activities	3	This policy effectively prohibits all financial support by industry for travel to offsite lectures and meetings by banning the receipt of compensation from industry, including the defraying of costs for simply attending CME or other activities.
Scholarships and Grants	3	The College of Medicine has established multiple policy barriers to effectively prevent conflicts of interest that arise from industry provision of scholarships and educational funds to students.

Curriculum	1	The College of Medicine indicated that there is no policy or portion of the curriculum that specifically addresses marketing, relationships with industry, and conflicts of interest.
Oversight	N	No mechanism for oversight was outlined in the policy.
Enforcement	N	No specific sanctions were outlined in the policy.

University of Virginia School of Medicine

Grade	1	Grade: C The institution has indicated it is revisiting and developing policies for some of the assessed domains. The original policies of University of Virginia School of Medicine are weak overall, and do not address off-site education, curriculum, and student scholarships.
Gifts and Meals	1	The School of Medicine prohibits gifts that "might reasonably tend to influence him/her in the discharge of his/her duties." This policy language clearly exempts gifts of nominal and minimal value.
Consulting	3	The School of Medicine requires that prior approval be obtained and that a written contract be produced for all outside consulting relationships.
Speaking	1	The School of Medicine has exempted honoraria received for lectures from the pre-approval and contract requirements for consulting relationships.
Disclosure	2	The School of Medicine requires that employees disclose all actual or potential conflicts of interest. Public disclosure not indicated.
Samples	1	This policy requires that sample drugs be on formulary and makes other provisions aimed mainly at patient safety, but does not take steps that would significantly limit use of samples as a marketing tool.
Purchasing and Formulary	3	School of Medicine employees who have relationships with industry may not participate in procurement transactions on behalf of the university involving industry entities with which the employee has the relationship.
Industry Sales Reps	2	The School of Medicine restricts vendor representatives access to patient care areas and prohibits promotion of non-formulary medications. In addition, representatives must schedule appointments in advance and register upon each arrival.
On-Site Educational Activities	1	CME events at the School of Medicine must adhere to ACCME guidelines, but non-CME industry-sponsored events are not held to the same standards.
Off-Site Educational Activities	1	The School of Medicine has indicated that policies regulating industry support for off-site lectures and meetings are currently under discussion.
Scholarships and Grants	1	The School of Medicine has indicated that policies on trainee scholarships and funding are currently under discussion.
Curriculum	1	The School of Medicine has indicated that curricular development on conflicts of interest and industry marketing are currently under discussion.
Oversight	N	The School of Medicine has indicated that oversight is currently under discussion.
Enforcement	N	The School of Medicine has indicated that oversight is currently under discussion.

University of Washington School of Medicine

Grade	1	This institution has informed us that they are revising or developing new policies.
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University of Wisconsin School of Medicine and Public Health

Grade	B	A reassessment including a review of newly submitted policies has increased the grade of University of Wisconsin School of Medicine and Public Health (UW SMPH) from a D to a B. UW SMPH possesses strong policies regulating industry interaction, including, notably, a commendable policy on samples, replacing them with vouchers to serve patients while providing equal access to generic medications. UW SMPH also has a comprehensive annual disclosure policy and an in-depth review procedure for certain key staff and researchers.
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Gifts and Meals	2	This institution has strong policies prohibiting the provision of on-site meals by industry and substantially limiting gifting. However, certain exceptions for educational gifts allow pharmaceutical marketing to continue to exert inappropriate influence on prescribing behavior. *This institutional ban on meals was missed in our original assessment.
Consulting	1	The institution has a detailed and rigorous review process in place for faculty with external relationships who are also involved in federally-funded research or human subjects research. However faculty not involved in such research who may have extensive external industry relationships do not qualify for review. In addition, the institution does not have policy language requiring all consulting relationships be described in an official contract, or that payment is commensurate to the task. Such provisions only exist for researchers.
Speaking	2	The institution does not have a policy that limits long-term external speaking relationships with industry. However, an encompassing annual disclosure process does capture all existent speaking relationships among faculty and reviews some of those relationships (those of faculty in federally-funded or human subjects research.)
Disclosure	2	Institution staff must annually disclose all external relationships.
Samples	2	This institution bans samples in all inpatient clinics and has established specific and very restrictive policies for their use in outpatient settings – specifically a voucher system has been instituted that provides equal access to both generic and brand-name medication. However, vouchers for brand-name medication may still be given directly to doctors by sales representatives.
Purchasing and Formulary	3	Members of purchasing or formulary committees may not participate in decisions wherein they have possible conflicts of interest.
Industry Sales Reps	2	The institution requires vendors to have an appointment before accessing the site, and expressly prohibits cold calling or soliciting an appointment. Vendors are also prohibited from patient care areas unless permission is obtained in advance from the patient and management.
On-Site Educational Activities	2	The School of Medicine requires that CME content be free of commercial influence and has put in place a review system to ensure educational programs are free of commercial bias. In addition, the institution's extensive CME policy states that all industry support is free of industry control, but no policy was provided relating to industry involvement in other educational non-accredited events.
Off-Site Educational Activities	1	The institution prohibits the payment of honoraria for meeting attendance, but this policy applies only to CME events sponsored by UW SMPH, not to off-site, industry-sponsored events. An additional CME policy on managing COI restricts faculty behavior off-site, but only applies to faculty involved in the planning of UW SMPH CME events, not faculty or students as a whole.
Scholarships and Grants	3	The institution requires grants and scholarships to be unrestricted, and requires that the office of the Associate Dean for Students select the student recipients.
Curriculum	3	A new policy on student/industry interaction outlines a thorough curricular requirement for medical students covering industry marketing tactics and effects of interaction on behavior and prescribing.
Oversight	Y	These policies cite responsible parties for oversight of CME conflicts of interest policies.
Enforcement	Y	These policies outline sanctions for noncompliance with the CME conflicts of interest policies.

Vanderbilt University School of Medicine

Grade	B	Most of the scorecard domains are addressed by Vanderbilt University School of Medicine in a clear, thorough and logical way that attempts to minimize conflicts of interest both for physicians-in-training and those contributing to the University's clinical, faculty, and research expertise. Vanderbilt did not address the conflicts of P & T committee members. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	3	All gifts and industry-provided meals are prohibited, both on and off campus.
Consulting	2	Consulting relationships are required to be described in a formal contract, which must receive prior approval if payment exceeds \$10,000/year. Payment must be commensurate with time and effort for specific services rendered.
Speaking	3	In order to engage in a speaking activity, the lecturer must ensure that industry has no approval or say in content, selection of topic, or speaker, and that his or her relationship to the company be disclosed.
Disclosure	2	The policy alludes to an annual COI disclosure tool; if public or patient disclosure included, the policy does not make this clear.

Samples	2	Samples are distributed through the pharmacy at all on-site clinics and institution facilities; off-site satellite clinics are not subject to these sample restrictions.
Purchasing and Formulary	2	Members of the P & T committee must disclose all conflicts per annual COI disclosure tool, but this policy does not lay out recusal or evaluation criteria for such disclosures.
Industry Sales Reps	2	Vendors are permitted access via advance appointments, but prohibited from visiting students or accessing in patient areas. An Electronic Marketing Plan is used to manage appointments.
On-Site Educational Activities	2	In addition to compliance with ACCME standards for both accredited and unaccredited programs, all agreements of grants supporting educational events at the School of Medicine must receive prior approval from the Division of Continuing Medical Education.
Off-Site Educational Activities	3	This policy prevents industry from selecting the speaker for the off-site educational
Scholarships and Grants	3	This policy effectively prevents industry from selecting the award recipient of scholarships and funds.
Curriculum	1	Issues of conflict of interest between the pharmaceutical industry and medical professionals do not appear to be covered in curriculum.
Oversight	N	This policy does not establish oversight,
Enforcement	Y	Though no party for oversight or compliance of policies mentioned, infractions may result in educational or disciplinary action.

Virginia Commonwealth University School of Medicine

Grade	D	This policy has gaps in gifts, purchasing and continuing education domains. Established guidelines for incoming faculty honoraria is an innovative measure, but it is unclear whether this applies only to incoming faculty for campus CME, or also to VCU faculty participating in courses further afield. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	1	No policy, or policy not provided.
Consulting	2	This policy requires prior approval for all consulting relationships, which may not exceed one day per calendar week.
Speaking	2	According to this policy, professional activities including speaking engagements should be short-term in nature and be for only nominal financial compensation. Relationships that do not meet this criteria must have prior approval.
Disclosure	2	Annual disclosure is required for all full-time faculty engaged in "outside professional activities," as defined by the institution.
Samples	1	The School of Medicine samples policy creates procedures for their acceptance, but does not significantly limit use of samples as a marketing tool.
Purchasing and Formulary	1	No policy, or policy not provided.
Industry Sales Reps	2	Vendor representatives may be on-site by appointment only, may not promote non-formulary drugs, and may not contact trainees except at educational conferences, which is a problematic exception.
On-Site Educational Activities	2	The School of Medicine adheres to ACCME standards for commercial support. The policy requires approval of all educational activities by the Office of Continuing Professional Development & Evaluation Studies.
Off-Site Educational Activities	1	No applicable policy.
Scholarships and Grants	1	No policy, or policy not provided.
Curriculum	1	No policy, or policy not provided.
Oversight	Y	Various parties named for oversight.
Enforcement Y		Sanctions referenced.

Wake Forest University School of Medicine

Grade	D	This institution provided a set of policies that address only some of the domains on which they were assessed. Those provided were generally average. The institution has put processes in place to manage faculty-industry relationships that stand to create the most significant conflicts of interest, but has not made conflicts of interest education for its trainees a priority. This institution has not consented to allow portions of their policy be cited for illustrative purposes.
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Gifts and Meals	1	The limits on gifts outlined in the policies do not go beyond those in AMA and PhRMA guidelines.
Consulting	2	Paid advisory arrangements must be approved by the department chairman. In addition, payments for consulting must be commensurate for services provided.
Speaking	1	No policy or policy not provided
Disclosure	2	The institution requires faculty with significant financial conflicts of interest to file an annual disclosure form.
Samples	1	The institution policy bans the distribution of non-formulary sample medications. However, no policies have been provided stipulating further regulation of samples.
Purchasing and Formulary	1	No policy or policy not provided
Industry Sales Reps	2	Industry sales representatives must sign in upon arrival and must have a pre-scheduled appointment.
On-Site Educational Activities	2	The institution requires adherence to ACCME standards for on-site CME activities.
Off-Site Educational Activities	1	No policy, or policy not provided
Scholarships and Grants	1	No policy, or policy not provided
Curriculum	1	No policy, or policy not provided
Oversight	Y	COI Review Committee provides oversight
Enforcement Y		Sanctions referenced

Washington University School of Medicine

Grade	B	Ambitious conflicts of interest policies at the Washington University School of Medicine cover most of the scored domains. If strictly interpreted and applied broadly, the policies are quite good. However, there is often a great degree of ambiguity - the language of the policies is often not specific enough to warrant the highest score in many areas. This institution has not consented to allow portions of its policy to be cited for illustrative purposes.
Gifts and Meals	3	The School of Medicine bans gifts from commercial companies to physicians who engage in clinical care. Additionally, the policy bans all industry-sponsored food and catered meals on School of Medicine premises and at educational conferences that trainees attend.
Consulting	2	This policy requires there be a contract for consulting activities, but does not require institutional review.
Speaking	1	The School of Medicine does not have a policy specific to speaking relationships and only requires a written agreement when receiving compensation for services from a commercial company. This is not considered a substantial limit on speaking relationships.
Disclosure	3	The School of Medicine has an excellent policy on disclosure, and was one of the few institutions to receive a perfect score in this domain. Most importantly, disclosure to patients is required when a physician's industry relationship is related to the patient's treatment. The policy also requires that all potential conflicts of interest be disclosed annually, as well as when new conflicts may arise. At times, disclosure to outside entities and the public may be required.
Samples	2	This policy requires that only low-income patients receive samples. While a commendable principle, this policy does not limit the use of samples by industry as a marketing tool. Other more restrictive programs on samples achieve this end while simultaneously ensuring that the needs of underserved patients are met.
Purchasing and Formulary	2	Purchasing and Formulary committee members must disclose their financial conflicts.
Industry Sales Reps	2	Industry representatives must have an appointment to be on School of Medicine premises. Representatives are not permitted in patient care areas and are prohibited from interacting with students and trainees without faculty presence.
On-Site Educational Activities	2	Unrestricted educational grants may be provided by industry, with educational program and materials under exclusive control of the School of Medicine. Additional guidelines for CME programs were referenced in the institution's response to request for policies, but the hyperlink provided was not active.
Off-Site Educational Activities	3	Under its comprehensive gifts policy, the School of Medicine bans cash payments, travel, free accommodations and payments for meeting registrations. Although the policy does not prohibit all industry support for off-site education by name, it is assumed the gifts policy applies.

Scholarships and Grants	1	No applicable policy.
Curriculum	1	No policy, or policy not provided.
Oversight	Y	The School of Medicine provides detailed information on the parties responsible for oversight of conflicts of interest policies. The institution has also established a compliance hotline to report or discuss concerns related to policies.
Enforcement	Y	The School of Medicine outlines clear sanctions for noncompliance with conflicts of interest policies.

Wayne State University School of Medicine

Grade	I	This institution submitted a response to the AMSA Pharm-Free Scorecard. Unfortunately the response was lost in the mail. AMSA has re-requested a response, and will assess this institution as soon as that response is received.
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Weill Medical College of Cornell University

Grade	D	This institution has only provided policies applicable to disclosure and participation in purchasing or formulary committees. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes
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Gifts and Meals	1	No policy or policy not provided
Consulting	1	No policy or policy not provided
Speaking	1	No policy or policy not provided
Disclosure	2	Annual disclosure required of all faculty and staff, regardless of potential conflicts.
Samples	1	No policy or policy not provided
Purchasing and Formulary	2	Members of purchasing committees must disclose via annual disclosure procedure.
Industry Sales Reps	1	No policy or policy not provided
On-Site Educational Activities	1	No policy or policy not provided
Off-Site Educational Activities	1	No policy or policy not provided
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	This policy references oversight.
Enforcement Y		This policy references sanctions.

West Virginia School of Osteopathic Medicine

Grade	I	This institution submitted new policies for review, but time was not sufficient to adjust their score pre-release. This in-process designation will remain in place until the score has been reassessed - a maximum of 60 days.
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West Virginia University School of Medicine

Grade	D	These policies apply only to students at West Virginia University School of Medicine. In general, they thinly cover the assessed domains, but too often lack the specifics, explanatory depth, and practical considerations to make them meaningful limits on industry conflict of interest. We understand informally that West Virginia SOM may be developing new COI policies. Were the institution to advise AMSA that this is the case, this grade would be changed to "In process."
Gifts and Meals	1	The School of Medicine does not place any substantive limits on gifting. "...acceptance of gifts from industry vendors is discouraged. Any gifts accepted by students should not be of substantial value. Accordingly, textbooks, modest meals, and other gifts are appropriate only if they serve a genuine educational function..."
Consulting	1	Not addressed in provided policy, which applies only to students.
Speaking	1	Not addressed in provided policy, which applies only to students.

Disclosure	1	Not addressed in provided policy, which applies only to students.
Samples	1	This policy does not provide any substantive control of samples: "...the use of drug samples for personal or family use is permissible as long as these practices do not interfere with patient access to drug samples."
Purchasing and Formulary	1	Not covered in provided policy.
Industry Sales Reps	2	"Industry vendors are not permitted in any patient care areas except to provide in-service training on devices and other equipment and then only by appointment. Industry vendors are permitted in non-patient care areas by appointment only."
On-Site Educational Activities	2	"Vendor support of educational conferences involving students may be used provided that the funds are provided to the institution not directly to the student."
Off-Site Educational Activities	1	This policy covers on-site education only.
Scholarships and Grants	1	Not covered in provided policy.
Curriculum	2	This policy indicates conflict of interest training for students exists, but does not elaborate.
Oversight	N	No oversight mechanism or charge granted.
Enforcement Y		This policy makes reference to sanctions.

Western University of Health Sciences - College of Osteopathic Medicine of the Pacific

Grade	F	This policy consists of a disclosure requirement for researchers, and did not address any of the scorecard domains related to individual conflict of interest created by pharmaceutical marketing. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	1	No policy or policy not provided
Consulting	1	No policy or policy not provided
Speaking	1	No policy or policy not provided
Disclosure	1	Disclosure applies only to researchers
Samples	1	No policy or policy not provided
Purchasing and Formulary	1	Disclosure policy applies, but only applicable to researchers and those with more than 'de minimis' relationships, which are not defined herein.
Industry Sales Reps	1	No policy or policy not provided
On-Site Educational Activities	1	No policy or policy not provided
Off-Site Educational Activities	1	No policy or policy not provided
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight	Y	This policy references oversight.
Enforcement Y		This policy references sanctions.

Wright State University Boonshoft School of Medicine

Grade	F	This institution indicated that as a community-based medical school without its own hospital it was not able to set policies on areas such as site access, P & T committee, or drug samples. A policy in the domains over which the medical school does have jurisdiction would improve its score. This institution has not indicated consent to allow portions of their policy be cited for illustrative purposes.
Gifts and Meals	1	The institution provided a gifts policy from one of its affiliated hospitals, but the medical school itself had no policy pertaining to gifts.

Consulting	1	The annual disclosure policy does not provide notes that some consulting relationships may require oversight, but the institution has not provided a policy stipulating when such oversight is warranted or sufficient standards to ensure legitimacy of consulting relationships.
Speaking	1	No policy or policy not provided
Disclosure	2	This policy requires annual disclosure and has a good form which includes a "below \$10,000" checkbox and "above \$10,000" checkbox.
Samples	N/A	Institution does not dispense prescription drugs
Purchasing and Formulary	N/A	Institution does not purchase prescription medicines
Industry Sales Reps	N/A	Pharmaceutical sales representatives do not visit the institution
On-Site Educational Activities	1	No policy or policy not provided
Off-Site Educational Activities	1	No policy or policy not provided
Scholarships and Grants	1	No policy or policy not provided
Curriculum	1	No policy or policy not provided
Oversight N		Oversight not established
Enforcement	N	Sanctions not referenced

Yale University School of Medicine

Grade	C*	An ambitious set of guidelines have been set by Yale University School of Medicine, covering all scored domains. However, as a set of guidelines they are not technically binding. Adherence to the guidelines is "strongly encouraged" by Yale, but it is questionable how useful the guidelines are if compliance is not required. Because they are guidelines, this policy has been downgraded from a B to a C.
Gifts and Meals	3	This School of Medicine completely bans all gifts and on-site meals.
Consulting	2	The guidelines request that payments for services to pharmaceutical companies are commensurate with services provided and that the terms of the arrangement and compensation be set forth in writing.
Speaking	2	The School of Medicine does not limit the longevity of speaking relationships, but does request that personnel who speak present their own material and that compensation is reasonable for services provided.
Disclosure	2	The guidelines suggest physicians internally disclose all potential and real conflicts of interest annually.
Samples	1	The guidelines place no restrictions on samples that would significantly limit their use as a marketing tool for pharmaceutical companies.
Purchasing and Formulary	3	Physicians contributing to institutional purchasing decisions at Yale must not have any financial interest in the companies manufacturing the products under consideration.
Industry Sales Reps	2	Pharmaceutical representatives are only permitted in non-patient care areas.
On-Site Educational Activities	2	The guidelines suggest that all on-site educational activities comply with ACCME standards, whether or not CME credit is awarded.
Off-Site Educational Activities	3	The School of Medicine does not permit physicians to accept defraying or direct reimbursement of costs associated with attending a CME or other instructional activity.
Scholarships and Grants	3	The School of Medicine must select the trainee to whom scholarship or other funds are to be awarded and the School of Medicine must also determine that the conference or training has educational merit.
Curriculum	1	The provided guidelines do not contain information about conflicts of interest portions of its curriculum, nor do they indicate that there is a course that covers conflicts of interest issues.
Oversight	N	Policies are guidelines only.
Enforcement	N	Policies are guidelines only.