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| Institution | A.T. Still University College of Osteopathic Medicine - Mesa and Kirksville |
| City | Mesa and Kirksville, MO |
| Overall Grade | F |
| Overall 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. Kirksville campus is covered by Mesa campus policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | A.T. Still University College of Osteopathic Medicine - Mesa and Kirksville |
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| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | Albany Medical College |
| City | Albany, NY |
| Overall Grade | B |
| Overall Comments | Albany Medical College has provided a set of strong policies that generally well-address the scorecard domains. Highlights of these policies include a general prohibition on samples and a ban on vendor gifts. Restrictions on vendor-supported meals would further strengthen this policy, as would the provision of regular disclosure requirements for staff and limitations on long-term speaking relationships such as speakers' bureaus. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 10/5/2009 |
| Gifts- Score & Comments | 2 Vendor gifts are prohibited. Other gifts and meals are permitted, but must be nominal (defined in the policy as being less than \$150 in value). |
| Consulting- Score & Comments | 2 There is institutional review of staff consulting relationships, but no explicit requirement for consulting relationships to be described in a contract. (Although relationships related to educational events must be described in a contract, there is no evidence that this requirement broadly applies to other consulting agreements.) |
| Speaking- Score & Comments | 2 Speakers and their managers must review content to ensure that the program is primarily educational in intent and presents a balance of available options or perspectives. |
| Disclosure- Score & Comments | 1 There is no requirement in policies provided that all staff periodically disclose external relationships. |
| Samples- Score & Comments | 3 Samples are generally prohibited from being distributed at the institution. Exceptions must be specially requesting in writing and approved by the Director of Pharmacy or the Formulary Committee. |

| Institution | Albany Medical College |
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| Purchasing- Score & Comments | 2 |
| | All committee members must disclose conflicts of interest, but the policy does not require that conflicted members recuse themselves from deliberations. |
| Sales Reps- Score & Comments | 2 |
| | Industry representatives may come on-site only by appointment and at the request of the individual being visited. |
| On Campus- Score & Comments | 2 |
| | While this institution establishes good oversight of industry funds to support educational events, it is not clear that industry may not stipulate the department to receive the funds, or stipulate the topic of the event. |
| Off Campus- Score & Comments | 2 |
| | The policy prevents industry from earmarking individuals for support for off-site education, but it is not clear that individuals cannot accept payment for attendance. |
| Industry Support- Score & Comments | 3 |
| | Although the policy does not differentiate between trainees and staff, it does prohibit industry from earmarking individuals for support for off-site education. |
| Curriculum- Score & Comments | 1 |
| | Correspondence submitted with this institution's policies refers to course requirements addressing conflicts of interest, but no evidence of this was included. |
| Oversight- Score & Comments | 1 |
| | Oversight is established |
| Non-Compliance- Score & Comments | 1 |
| | Sanctions are referenced |

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| Institution | Albert Einstein College of Medicine |
| City | New York, NY |
| Overall Grade | C |
| Overall Comments | <p>Albert Einstein College of Medicine submitted both its own institutional policies as well as those of its affiliated medical centers, which had some overlap and variance in regulation. The institution scored highest in policies regarding on-site activity, as well as educational activities, but did not have exemplary policies governing disclosure and speaking and consulting relationships. Albert Einstein College of Medicine submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade improves from an F to a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>2</p> <p>One of Einstein's affiliated medical centers has an exemplary and complete gift ban. However, the institution itself and the other affiliated medical center do not have gift ban policies.</p> |
| Consulting- Score & Comments | <p>1</p> <p>There is no policy on consulting applicable to all faculty and staff. The Board of Trustees, Committee members and officers are required to disclose payments of more than \$10,000 per year that are subject to review after disclosure.</p> |
| Speaking- Score & Comments | <p>1</p> <p>There was no applicable policy on speaking relationships provided.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>The Board of Trustees and all members of Committees at the institution are required to disclose all material conflicts on an annual basis. All faculty and researchers at the institution are also required to disclose financial interests at initial employment and periodically thereafter, as well as before any research funded by grants.</p> |
| Samples- Score & Comments | <p>3</p> <p>Sample medications or devices are not permitted and may not be left in any area on site.</p> |

| Institution | Albert Einstein College of Medicine |
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| Purchasing- Score & Comments | 1 No policy provided in this domain. |
| Sales Reps- Score & Comments | 2 Vendor representatives are only permitted in non-patient care areas by appointment and must be registered with the institution before their first visit. |
| On Campus- Score & Comments | 2 Industry support for CME is permitted. The institution cites ACCME standards and uses a peer-review process to ensure CME presentations are free from bias. |
| Off Campus- Score & Comments | 2 Reasonable business expenses, including travel, lodging, and meals provided within the regular course of business are permitted to be paid. |
| Industry Support- Score & Comments | 1 There was no policy provided for scholarships and trainee funds. |
| Curriculum- Score & Comments | 1 No curricular materials were provided |
| Oversight- Score & Comments | 1 The Conflict of Interest Committee, along with Department heads, is responsible for oversight. |
| Non-Compliance- Score & Comments | 1 Sanctions for noncompliance are noted. |

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| Institution | Arizona College of Osteopathic Medicine |
| City | Glendale, AZ |
| Overall Grade | F |
| Overall Comments | Arizona College of Osteopathic Medicine declined to participate in AMSA PharmFree Scorecard 2008 and did not respond to requests for information for the 2009 Scorecard. 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Arizona College of Osteopathic Medicine |
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| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | Baylor College of Medicine |
| City | Houston, TX |
| Overall Grade | B |
| Overall Comments | Baylor College of Medicine has several excellent policies, especially in the domains regarding consulting arrangements, formulary committees and travel to off-site events. The rest of the policies are solid, with the exception of curriculum, which is not covered in this policy. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from an I to a B. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 7/8/2009 |
| Gifts- Score & Comments | 2 All meals and most gifts are banned- however, educational gifts, such as textbooks, are permitted. |
| Consulting- Score & Comments | 3 All consulting relationships must be written in a formal contract, with appropriate compensation, and must be approved in advance by the institution. |
| Speaking- Score & Comments | 2 Speaking at off-site CME events must be written in a formal agreement, approved in advance and payment must be at fair market value. |
| Disclosure- Score & Comments | 2 All covered personell are required to make annual internal disclosures of their financial relationships |
| Samples- Score & Comments | 2 The institution does not permit personnel or trainees to directly accept free drug samples. Instead, all samples must be managed at a central repository. |

| Institution | Baylor College of Medicine |
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| Purchasing- Score & Comments | 3 Contracts between the institution and businesses must be negotiated on behalf of the institution by someone who does not have a relationship with the business. |
| Sales Reps- Score & Comments | 2 Industry representatives are permitted on-site by invitation only, and then only in non-patient care areas. |
| On Campus- Score & Comments | 2 The institution adheres to ACCME standards for all CME activities. |
| Off Campus- Score & Comments | 3 All industry support for travel to off-site educational events is permitted as long as the institution chooses the recipients of the funds and additional payment for attendance is not permitted. |
| Industry Support- Score & Comments | 3 All recipients of industry-sponsored scholarships and trainee funds will be chosen by the institution, with the understanding of no quid pro quo. |
| Curriculum- Score & Comments | 1 No applicable policy was included. |
| Oversight- Score & Comments | 1 Oversight was clearly mentioned. |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | Boston University School of Medicine |
| City | Boston, MA |
| Overall Grade | B |
| Overall Comments | 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 - measures to ensure drug reps may never hand samples directly to physicians, even if physicians are required to give these samples to the pharmacy. This institution was reassessed after the 2009 launch, improving their domain score for curriculum. Their grade remains a B. This institution's evaluation was last updated: 11/10/2009 |
| Gifts- Score & Comments | 3 All gifts and meals "directly or indirectly funded by industry" are prohibited in the hospital and on campus. |
| Consulting- Score & Comments | 2 Consulting relationships are required to be set forth in writing for legitimate, specific services, and are subject to annual disclosure. |
| Speaking- Score & Comments | 2 Clinicians with speaking engagements for industry should receive only fair market compensation, and must maintain control over lecture content. |
| Disclosure- Score & Comments | 2 Per University policy, annual disclosure of all business/financial relationships is required of all faculty and staff. |
| Samples- Score & Comments | 2 All samples must be dispensed through the pharmacy, and use by clinicians, staff, and their family is prohibited. Although physicians must give samples they receive to the pharmacy for management and distribution, pharmaceutical sales reps are still able to initially hand samples to physicians, which can perpetuate the use of samples by industry as a marketing tool to influence prescribing. |

| Institution | Boston University School of Medicine |
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| Purchasing- Score & Comments | 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." |
| Sales Reps- Score & Comments | 2 Industry representatives must have an appointment with a clinician, and are banned from all patient-care areas. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 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." |
| Industry Support- Score & Comments | 3 Industry may not select recipients of scholarships. |
| Curriculum- Score & Comments | 3 This institution has demonstrated robust curricular coverage of conflicts of interest and the effects of industry marketing on clinical decision-making. |
| Oversight- Score & Comments | 1 Department chairs are responsible for enforcing policies, and report to the Chief Medical Officer. |
| Non-Compliance- Score & Comments | 0 Sanctions referenced in this policy. |

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| Institution | Brown University School of Medicine |
| City | Providence, RI |
| Overall Grade | I |
| Overall Comments | <p>This institution demonstrated an ongoing policy development process, allowing their In Process designation to be extended beyond one year. 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 conflict of interest policies. A short conflict of interest policy that was provided is applicable to Brown medical school faculty, but it does not address key issues related to pharmaceutical marketing. This institution has not indicated consent to allow portions of its policy to be cited for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>Policy on research relationships only provided.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>No policy provided related to general disclosure.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |

| Institution | Brown University School of Medicine |
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| Purchasing- Score & Comments | 1 No policy, or policy not provided. |
| Sales Reps- Score & Comments | 1 No policy, or policy not provided. |
| On Campus- Score & Comments | 1 No policy, or policy not provided. |
| Off Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 0 No party named for oversight. |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced. |

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| Institution | Case Western Reserve University School of Medicine |
| City | Cleveland, OH |
| Overall Grade | D |
| Overall Comments | <p>This institution's policy makes limited efforts to monitor and limit the relationship between industry and its physicians beyond an incomplete reporting requirement. The institution even allows speaker's bureaus and ghostwriting, activities widely accepted by the profession to be problematic and unsupportive of academic inquiry, to take place in the presence of a possible management plan. This represents the first substantive submission to the Scorecard by Case Western Reserve University School of Medicine. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 8/24/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>This policy allows "business-related" gifts.</p> |
| Consulting- Score & Comments | <p>2</p> <p>Review of consulting relationships does not seem to be required in advance, but reports are reviewed and "approved" or given management plans.</p> |
| Speaking- Score & Comments | <p>1</p> <p>Speaking relationships may be allowed with "suitable management plan". Long-term speaking relationships such as speaker's bureaus are not prohibited or regulated.</p> |
| Disclosure- Score & Comments | <p>1</p> <p>Post doc fellows are excluded from disclosure requirements</p> |
| Samples- Score & Comments | <p>1</p> <p>This policy does not address samples.</p> |

| Institution | Case Western Reserve University School of Medicine |
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| Purchasing- Score & Comments | 2 Purchasing and formulary committee members must disclose external relationships, but the policy provided does not address recusal from decisions where a conflict exists. |
| Sales Reps- Score & Comments | 1 This policy does not address site access by industry sales representatives. |
| On Campus- Score & Comments | 1 This policy does not address on-site education sponsorship by industry |
| Off Campus- Score & Comments | 1 This policy does not prevent or monitor industry support for travel to and attendance at off-site events. |
| Industry Support- Score & Comments | 1 This policy does not put meaningful limits on industry support of trainees and fellows through scholarships |
| Curriculum- Score & Comments | 1 Curricular materials were not provided |
| Oversight- Score & Comments | 1 The Conflict of Interest Committee seems to have oversight over this policy, though it is unclear that its role is an active one. |
| Non-Compliance- Score & Comments | 1 This policy establishes sanctions for non-compliance. |

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| Institution | Chlcago College of Osteopathic Medicine |
| City | Chicago, IL |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Chlcago College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | Chicago Medical School at Rosalind Franklin University |
| City | Chicago, IL |
| Overall Grade | B |
| Overall Comments | This institution submitted a commendable set of policies governing industry relationships and conflicts of interest. Highlights include pre-approval of consulting relationships and restriction of long-term speaking engagements known as speakers' bureaus. A requirement for periodic disclosure would be a welcome addition to this submission. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 8/18/2009 |
| Gifts- Score & Comments | 2 This institution bans gifts from industry completely. Industry may provide food for CME events. |
| Consulting- Score & Comments | 2 Consulting work must be approved by a department chair before engagement, and must not be for marketing purposes, or "raise questions of conflict of interest" with the employees university work. |
| Speaking- Score & Comments | 3 This policy is explicit in its restrictions on speaking engagements that involve industry, and would prevent participation on speakers' bureaus. |
| Disclosure- Score & Comments | 1 This institution has not provided a disclosure component. |
| Samples- Score & Comments | 2 This policy treats samples as a gift, and indicates central management through the pharmacy, though the distribution method is not made explicit here |

| Institution | Chicago Medical School at Rosalind Franklin University |
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| Purchasing- Score & Comments | 3 Members with a conflict of interest (defined helpfully here as inclusive of financial, familial, and organizational interests) are required to recuse themselves of decisions involving those interests. |
| Sales Reps- Score & Comments | 2 Industry representatives may only come on site by appointment, and may not enter patient care areas. |
| On Campus- Score & Comments | 2 This policy requires central oversight of industry support for CME, but the policy does not state that industry may earmark their contribution to a specific department or program. |
| Off Campus- Score & Comments | 3 This policy prohibits industry support for attending an off-site event. Additionally, employees are prohibited from attending non-accredited events sponsored by industry (see gifts). |
| Industry Support- Score & Comments | 3 This policy limits industry access or quid pro quo to scholarship recipients. |
| Curriculum- Score & Comments | 3 This institution furnished the scorecard with an extensive and thoughtful curriculum on pharmaceutical influence on medical education |
| Oversight- Score & Comments | 0 This policy does not establish active oversight. |
| Non-Compliance- Score & Comments | 1 This policy establishes the potential for university-based sanctions. |

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| Institution | Columbia University College of Physicians and Surgeons |
| City | New York, NY |
| Overall Grade | B |
| Overall Comments | <p>Columbia University College of Physicians and Surgeons continues to have strong policies governing conflicts of interest and industry relationships. This institution's score has increased in the areas of industry supported travel to off-site events and scholarships. However its scores have gone down for the domains on speaking relationships and disclosure. A disclosure floor of \$10,000 is a weakness. Other policies remain strong. These policies include a requirement for recusal of individuals with conflicts of interest from purchasing and formulary decisions. Additionally, a new mandate that allows for industry reimbursement of travel only for legitimate professional services is a welcome addition to Columbia's overall conflict of interest policy. Columbia University College of Physicians and Surgeons submitted selected new policies to the AMSA PharmFree Scorecard in 2009. Their grade remains a B. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>2</p> <p>Gifts are banned entirely, but there is no explicit prohibition of industry funding of on-site meals</p> |
| Consulting- Score & Comments | <p>1</p> <p>Income from consulting must be disclosed, but only when it is greater than \$10,000 per year from a single outside entity. Faculty are limited to participating in such outside relationships no more than once per week, but neither of these restrictions are enough to provide sufficient oversight of potential conflicts of interest.</p> |
| Speaking- Score & Comments | <p>1</p> <p>There are no significant restrictions on speaking relationships. Faculty are discouraged, but not prohibited, from participating in speaker's bureaus. Speaking relationships must be disclosed, but only when remuneration exceeds \$10,000 per year.</p> |
| Disclosure- Score & Comments | <p>1</p> <p>Disclosure is required for all faculty on an annual basis, but only for remuneration in excess of \$10,000 per year per source.</p> |
| Samples- Score & Comments | <p>3</p> <p>Samples are banned from the major clinical facility</p> |

| Institution | Columbia University College of Physicians and Surgeons |
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| Purchasing- Score & Comments | 3 Faculty may not participate in decisions involving the purchasing of goods or services if they have a financial interest in the relevant company. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are permitted to meet with faculty and staff by appointment only. |
| On Campus- Score & Comments | 2 The content of on-site educational events must be independent of industry influence and solely determined by the faculty involved. |
| Off Campus- Score & Comments | 2 Payment for attendance is not specifically prohibited, but there are good limits on travel reimbursements for attendees. |
| Industry Support- Score & Comments | 3 Individual departments at the institution must administer all scholarships and funding for trainees. strong. |
| Curriculum- Score & Comments | 1 Although student training on COI was mentioned in the cover-letter of this institution's submission, curricular materials or a policy stipulating this were not provided. |
| Oversight- Score & Comments | 1 Oversight is established |
| Non-Compliance- Score & Comments | 1 Sanctions are referenced. |

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| Institution | Creighton University School of Medicine |
| City | Omaha, NE |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 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- Score & Comments | 1 This policy places no limits on consulting engagements, other than annual disclosure for researchers who earn over \$10,000/year extramurally. |
| Speaking- Score & Comments | 1 This policy places no limits on speaking engagements, other than annual disclosure for researchers who earn over \$10,000 extramurally. |
| Disclosure- Score & Comments | 1 This disclosure policy, which applies only to researchers, is not comprehensive because of its \$10,000/year floor. |
| Samples- Score & Comments | 1 No policy, or policy not provided. |

| Institution | Creighton University School of Medicine |
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| Purchasing- Score & Comments | 1 No policy, or policy not provided. |
| Sales Reps- Score & Comments | 2 Sales representatives must have an appointment scheduled for access to the campus and are banned from patient care areas. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 0 There is no enforcement or supervisory authority granted beyond the university-wide disclosure requirement. |
| Non-Compliance- Score & Comments | 1 There are sanctions listed for noncompliance with policies. |

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| Institution | Dartmouth Medical School |
| City | Hanover, NH |
| Overall Grade | B |
| Overall Comments | Dartmouth Medical School has an outstanding set of policies, with model language in nearly all domains, particularly gifts, external consulting and industry support of CME, where funding is centralized at the institutional level. A ban on samples is also exemplary. Limitations on long-term speaking relationships, such as speaker's bureaus, might be a good next step. Dartmouth Medical School policies were first assessed for the 2009 Scorecard launch. The institution's score was updated twice, once after provision of curricular materials, and once after a requested reassessment, improving the institution's overall grade from a D to a B. This institution's evaluation was last updated: 10/5/2009 |
| Gifts- Score & Comments | 3 Any provision of food on-site or acceptance of gifts or trinkets of any value is prohibited. |
| Consulting- Score & Comments | 3 Exemplary. All professional services to the medical industry in exchange for remuneration are required to have a detailed formal contract with payment at fair market value that is reviewed and approved in advance by the Department Chief or Executive Leadership. |
| Speaking- Score & Comments | 2 A signed written agreement approved by the department chairman must be established in advance of all engagements. There are also requirements for the speaker's compensation to be at fair market value. |
| Disclosure- Score & Comments | 2 Annual internal disclosure of external relationships of the faculty member (including spousal relationships) is required. |
| Samples- Score & Comments | 3 This institution prohibits the distribution of pharmaceutical samples for patient use. |

| Institution | Dartmouth Medical School |
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| Purchasing- Score & Comments | 2 Members of purchasing committees must disclose via annual disclosure procedure, and all gifts, gratuities and incentives given must be reviewed by the D-H administrator overseeing the buying department or organization. A requirement for recusal from purchasing decisions when conflicting financial relationships exist would further strengthen this policy. |
| Sales Reps- Score & Comments | 2 Sales representatives may meet with physicians by appointment only. |
| On Campus- Score & Comments | 3 All unrestricted funds must be given directly to the office of the Hitchcock Foundation, who will retain control over the content of the educational activities sponsored. |
| Off Campus- Score & Comments | 3 Personnel who attend industry sponsored educational programs may not accept subsidies from industry towards travel, lodging or coming to the program. |
| Industry Support- Score & Comments | 3 All unrestricted funds from industry must go through the office of the Hitchcock Foundation, which will then be distributed to departments as wished. The Hitchcock Foundation reserves the right to refuse any unrestricted funds and will make a yearly report of all funds received to the Board of Governors. |
| Curriculum- Score & Comments | 3 A course outline provided covers local, state and federal regulations regarding prescribing, keeping up with new drugs and new information, and industry marketing practices. |
| Oversight- Score & Comments | 1 The Compliance Office is responsible for oversight. There is also a Compliance hotline available for the reporting of compliance concerns or violations. |
| Non-Compliance- Score & Comments | 1 Sanctions are clearly outlined in the policy. |

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| Institution | Des Moines University College of Osteopathic Medicine |
| City | Des Moines, IA |
| Overall Grade | I |
| Overall Comments | <p>This institution has informed us that they are revising or developing their policies. However they have provided material for review. Des Moines University College of Osteopathic Medicine has a strong gift ban and is in the process of developing what appears to be a strong curricular program addressing conflict of interest with industry. Outside employment must be approved in advance by one's supervisor, and there are some limits on industry influence at on-site educational events and funding for trainees. However, in almost all other domains, there is either no relevant policy, or only a very weak one that does not substantially limit industry influence. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their status is In Process. Their provisional grade is a D. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>There is a complete ban on gifts and on-site meals.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>Full time staff must have any outside employment pre-approved by their supervisor. However, there is no provision for commensurate payment or a requirement for a formal contract</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>No policy or policy not provided.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>Trustees, directors, and faculty in other management positions must disclose any financial conflicts of interest annually; however, this does not apply to all faculty.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>Although samples are limited to low-income patients and situations in which a trial period of a drug can be helpful in determining the best course of treatment, the use of samples is ultimately left to the discretion of the physician without any significant limitations on their use as a marketing tool.</p> |

| Institution | Des Moines University College of Osteopathic Medicine |
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| Purchasing- Score & Comments | 1 This institution does not operate a formulary |
| Sales Reps- Score & Comments | 1 The policy discourages faculty from meeting with industry sales representatives, but ultimately leaves the decision to the individual physician. |
| On Campus- Score & Comments | 2 This institution has a central office "through which all requests for industry support and receipt of funds for CME activity are coordinated and overseen." Additionally, the policy cites adherence to ACCME standards as a requirement for on-campus educational events. |
| Off Campus- Score & Comments | 1 No policy or policy not provided. |
| Industry Support- Score & Comments | 2 Scholarship funds must be given to the central administration for distribution. No additional relevant policies were provided. |
| Curriculum- Score & Comments | 3 This institution is in the process of developing curricular materials that will "help students understand the conflicts that may arise between industry representatives and health care professionals and how to develop and sustain productive and ethical relationships." |
| Oversight- Score & Comments | 1 Oversight is established. |
| Non-Compliance- Score & Comments | 1 This institution's ethics policy requires compliance with all institutional policies and broadly defines sanctions for noncompliance. |

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|------------------------------|---|
| Institution | Drexel University College of Medicine |
| City | Philadelphia, PA |
| Overall Grade | I |
| Overall Comments | In 2009, this institution informed us for the first time that they are revising or developing new policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Drexel University College of Medicine |
|------------------------------------|---------------------------------------|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | Duke University School of Medicine |
| City | Durham, NC |
| Overall Grade | C |
| Overall Comments | Although commendable in some areas, Duke University School of Medicine's policies overall are not very stringent. There are no codified limits on industry speaking relationships, nor on the use of samples as a marketing tool, nor is there meaningful language limiting industry payment for attending off-site meetings. There are good review systems in place for disclosures, and review of all consulting contracts over \$600. Duke University School of Medicine submitted revised policies to the 2009 AMSA PharmFree Scorecard, and materials for reassessment in October 2009. Their grade improves from a D to a C. This institution has not indicated consent to allow the public posting of their policies. This institution's evaluation was last updated: 2/1/2010 |
| Gifts- Score & Comments | 2 Gifts at a value of \$25 or more are banned. Promotional materials (e.g. mugs, pens, note pads) are also not permitted. Gifts for educational purposes and compliant with PhRMA code are permitted, as are meals "directly related to a valid educational session that has been approved by the area manager." |
| Consulting- Score & Comments | 2 All payments from outside sources, including consulting fees, must be disclosed to and subsequently reviewed by the institution, but only if they are greater than or equal to \$600 per calendar year. |
| Speaking- Score & Comments | 1 Although Duke University School of Medicine indicated that they had a policy on speaking relationships, no such policy was submitted for scoring. |
| Disclosure- Score & Comments | 2 All personnel must disclose financial ties with the pharmaceutical industry on an annual basis. |
| Samples- Score & Comments | 1 There are no significant restrictions on the use of samples as a marketing tool. |

| Institution | Duke University School of Medicine |
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| Purchasing- Score & Comments | 2 Individuals who participate in formulary decisions must disclose relevant conflicts of interest. While Duke has advised AMSA that in practice all formulary committee members abstain from voting when conflicts exist, this requirement is not codified in any policy provided, limiting the score in this domain to a 2. |
| Sales Reps- Score & Comments | 2 Pharmaceutical sales representatives are permitted to meet with faculty by appointment. |
| On Campus- Score & Comments | 2 The policy cites adherence to ACCME standards as the principal governing factor for the management of conflicts of interest arising from on-site education. |
| Off Campus- Score & Comments | 1 While Duke policy states that educational grants, gifts or meals (whether on- or off-site) may not be accepted as remuneration for Duke's purchase of materials or services, the policy does not address industry payment to attend off-site meetings, or the provision of travel support to attend such meetings, when this industry support is not considered remuneration for Duke's purchase of materials or services. |
| Industry Support- Score & Comments | 3 Scholarships and funds for trainees must be approved by the Office of Grants and Contracts. |
| Curriculum- Score & Comments | 3 All medical residents and fellows must complete trainings on the relationships between the pharmaceutical industry and medical staff, including the ways in which industry may influence medical-decision making. |
| Oversight- Score & Comments | 1 This policy references oversight. |
| Non-Compliance- Score & Comments | 1 This policy references sanctions. |

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| Institution | East Tennessee State University - James H. Quillen College of Medicine |
| City | Johnson City, TN |
| Overall Grade | B |
| Overall Comments | <p>East Tennessee State University - James H. Quillen College of Medicine has a strong gift ban. Its other policies tend to be more moderate, though comprehensive. One noteworthy absence is the lack of any requirement for individuals to disclose all financial relationships and potential conflicts of interest. Additionally, there are no established methods for oversight or sanctions for noncompliance. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Although the policy submitted was titled draft, this institution indicated a policy implementation date of March 1, 2009, in their submission checklist. Their grade improves from a D to a B. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>Gifts and on-site meals are prohibited.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>There are no significant limitations on consulting relationships at the individual level.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>Lecture content must be determined by the speaker, without influence from industry.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>Disclosure is required for conflicts of interest at the institutional level, but there is no specific disclosure requirement for individuals.</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>All samples are distributed and managed from a central location.</p> |

| Institution | East Tennessee State University - James H. Quillen College of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 2 Disclosure, but not recusal, is required for all individuals making purchasing decisions. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are allowed to meet with faculty by appointment only. |
| On Campus- Score & Comments | 2 Compliance with ACCME standards is cited as the primary mechanism by which on-site education is to be regulated. |
| Off Campus- Score & Comments | 3 Attendees cannot be paid to attend off-site events or be reimbursed for travel. This regulation does not include people providing legitimate services. |
| Industry Support- Score & Comments | 3 The recipient of scholarship funds must be selected by the institution without influence of the industry. |
| Curriculum- Score & Comments | 1 No policy or policy not provided |
| Oversight- Score & Comments | 0 Oversight is not established. |
| Non-Compliance- Score & Comments | 0 Sanctions are not referenced |

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|------------------------------|---|
| Institution | Eastern Virginia Medical School |
| City | Norfolk, VA |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 The consulting requirements established here would not limit participation on or compensation for speakers bureaus, for which there is no institutional review. |
| Disclosure- Score & Comments | 1 This policy mandates disclosure only for applicants of federal research grants, and has a \$10,000 disclosure floor. |
| Samples- Score & Comments | 1 This policy's stipulation that samples may not be sold does not qualify as a significant limit on samples as a marketing tool. |

| Institution | Eastern Virginia Medical School |
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| Purchasing- Score & Comments | 1 According to the policy submission, Medical School faculty work at hospitals with individual purchasing and formulary decisions. |
| Sales Reps- Score & Comments | 1 "Industry representatives are generally discouraged in patient care areas." This policy is weak and permits vendors unrestricted access to the Medical School. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 3 The Medical School stipulates that scholarship designees will be selected by their medical school department, representing institutional review. |
| Curriculum- Score & Comments | 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- Score & Comments | 1 This policy establishes oversight. |
| Non-Compliance- Score & Comments | 1 This policy makes reference to sanctions. |

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| Institution | Edward Via Virginia College of Osteopathic Medicine |
| City | Blacksburg, VA |
| Overall Grade | F |
| Overall Comments | This institution declined to participate in AMSA PharmFree Scorecard 2008 and did not respond to requests for information for the 2009 Scorecard. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Edward Via Virginia College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | Emory University School of Medicine |
| City | Atlanta, GA |
| Overall Grade | B |
| Overall Comments | This institution has a robust set of policies that address industry relationships in a consistently thorough manner. Highlights of this policy set include a requirement for pre-approval of all compensated external relationships, as well as an explicit ban on participation in speakers' bureaus. Strict controls on industry funding of educational events and a ban on industry-provided gifts and meals are also praiseworthy. |
| Gifts- Score & Comments | 3 All industry meals, both on-site and off-site are prohibited. Gifts from industry are banned |
| Consulting- Score & Comments | 3 While certain conditions that apply to various consulting situations, there is no general requirement for a formal contract. However, pay must be commensurate to the task, and all external relationships must have prior approval. |
| Speaking- Score & Comments | 3 Staff, students and faculty are explicitly prohibited from participating in speaker's bureaus when the purpose of the event is marketing. When faculty do engage in paid speaking engagements, industry may not exercise any control over presentation content or materials. |
| Disclosure- Score & Comments | 2 Disclosure of all compensated external activities is required at the time such a potential conflict arises, as well as annually through an online reporting system. This institution is also working on a public website that patients can access, details of which are being finalized. |
| Samples- Score & Comments | 2 Individual faculty and staff may not receive or distribute samples, but they may be accepted and dispensed through the central pharmacy. |

| Institution | Emory University School of Medicine |
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| Purchasing- Score & Comments | 3 Individuals must recuse themselves from decisions and discussions when conflicted |
| Sales Reps- Score & Comments | 2 Industry sales representatives are only allowed on site by invitation and appointment. Industry representatives must also register under the Status Blue system and wear proper identification. |
| On Campus- Score & Comments | 2 Industry has very limited control of how donated funds are used. While the institution does not have a single fund through which all donations much flow, industry support is highly regulated. |
| Off Campus- Score & Comments | 3 Faculty, staff and students may not accept support for attending off-site meetings. |
| Industry Support- Score & Comments | 3 Industry may not designate funds for individual recipients. |
| Curriculum- Score & Comments | 1 No information on portions of curriculum related to conflicts of interest or to pharmaceutical industry marketing were submitted. |
| Oversight- Score & Comments | 1 There is a COI-research office responsible for oversight of all policies. |
| Non-Compliance- Score & Comments | 1 Each case of noncompliance is addressed by the Dean's Office which may apply various degrees of disciplinary action. |

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| Institution | Florida State University College of Medicine |
| City | Tallahassee, FL |
| Overall Grade | B |
| Overall Comments | 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 2 Annual disclosure to Personnel office is mandated, but without stipulation for patient or public notification. |
| Samples- Score & Comments | 1 No policy, or policy not provided. |

| Institution | Florida State University College of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 1 |
| | Although the policy stipulates that scholarships for students must go to a central fund, no similar limit exists for general educational grants applicable to faculty, staff and trainees. Thus, funds for on-site educational activities may not be adequately restricted. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 3 |
| | An excellent policy. Along with providing guidelines, this policy states that seminars and faculty development sessions will cover: 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- Score & Comments | 1 |
| | 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." |
| Non-Compliance- Score & Comments | 0 |
| | This policy does not refer to sanctions. |

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| Institution | George Washington University School of Medicine |
| City | Washington, DC |
| Overall Grade | D |
| Overall Comments | <p>This institution provided a policy for faculty conduct including only disclosure provisions. Policies governing the affiliated pediatric hospital were submitted in addition, but do not affect, based on the nature of a 4-year medical college, enough faculty, staff and trainees to represent a comprehensive policy. However, these Children's National Medical Center (CNMC) policies are strong in many domains. CNMC suggests it has additional policies regarding the conduct with pharmaceutical sales representatives, but the Scorecard was not provided those policies. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 8/16/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>This policy cites adherence to AMA standards, which does not constitute a meaningful limit on meals or gifts from pharmaceutical and medical device companies. [For the Children's National Medical Center (CNMC), no meals, gifts, sports tickets are permitted]</p> |
| Consulting- Score & Comments | <p>1</p> <p>This policy requires that faculty who enter into consulting agreements must make them independent of the university setting. The institution places no substantive approval processes or limits on consulting arrangements [although the CNMC has good consulting regulations requiring a written contract for fair market value and legitimate services only, with prior review by the legal department].</p> |
| Speaking- Score & Comments | <p>1</p> <p>Regulation of speaking relationships is not addressed by the medical school. [CNMC explicitly prohibits Speaker's Bureaus except for "exceptional circumstances," for which prior written approval must be garnered]</p> |
| Disclosure- Score & Comments | <p>1</p> <p>The institution requires that only full-time faculty make disclosures.</p> |
| Samples- Score & Comments | <p>1</p> <p>The sole samples policy provided was a CNMC policy stating samples "must be processed through the pharmacy and utilize a specific policy and procedure about their distribution"</p> |

| Institution | George Washington University School of Medicine |
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| Purchasing- Score & Comments | 1 A policy clearly applicable to purchasing and formulary decisions was not provided. |
| Sales Reps- Score & Comments | 1 The sole policy covering site-access by industry representatives was a CNMC policy. |
| On Campus- Score & Comments | 2 Whether the medical school extends the ACCME standards for commercial support to non-accredited education programs is unclear but implied. |
| Off Campus- Score & Comments | 1 No medical school policy related to attendance at off-site educational events was provided. |
| Industry Support- Score & Comments | 1 The medical school policy mentions that pharma reps should not have interaction with trainees, but does not place limits on the funding of trainees by industry. |
| Curriculum- Score & Comments | 3 A detailed curriculum on pharmaceutical industry influence on prescribing was provided. |
| Oversight- Score & Comments | 1 A compliance officer is responsible for policy adherence and reports to the compliance committee |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | Georgetown University School of Medicine |
| City | Washington, DC |
| Overall Grade | I |
| Overall Comments | Georgetown University School of Medicine has submitted both a current policy and a draft policy that they have indicated will be implemented by the end of the current academic year. As such, the assessment below is provisional in nature. Georgetown should be commended for its exemplary coverage of conflicts of interest and pharmaceutical marketing in its medical school curriculum. The total gift ban that is included in the draft is a model policy as well. The draft policy also requires centralized distribution of drug samples, site access by pharmaceutical representatives allowed by appointment only, and more stringent limitations on industry-sponsored educational programs, both on- and off-site. Georgetown University School of Medicine's submission has been provisionally assessed as a B. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 The draft policy cites a complete ban on gifts. |
| Consulting- Score & Comments | 1 Consulting relationships that may pose a conflict of interest must be disclosed, but approval is only required for cases in which the individual is paid more than \$10,000. |
| Speaking- Score & Comments | 2 Faculty must disclose speaking relationships to the university, and payments for speaking engagements must be at fair market value. |
| Disclosure- Score & Comments | 2 All faculty and staff must disclose any financial relationships at the start of their employment, as well as any time the circumstances of their financial relationships change. |
| Samples- Score & Comments | 2 Samples must be dispensed from a controlled central location. |

| Institution | Georgetown University School of Medicine |
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| Purchasing- Score & Comments | 3 Faculty/staff with financial interests must recuse themselves from purchasing decisions. |
| Sales Reps- Score & Comments | 2 Industry sales representatives may meet with faculty by appointment only. |
| On Campus- Score & Comments | 2 This institution relies primarily on ACCME standards to manage conflict of interest in on-site education. |
| Off Campus- Score & Comments | 2 Accepting payment for attendance at off-site meetings is prohibited. The acceptance of travel funds is also prohibited, except for reasonable reimbursement |
| Industry Support- Score & Comments | 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- Score & Comments | 3 The institution has provided curricular materials that demonstrate excellent and comprehensive coverage of the effects of pharmaceutical marketing and financial conflicts of interest. |
| Oversight- Score & Comments | 1 Oversight is established. |
| Non-Compliance- Score & Comments | 1 Sanctions for noncompliance are referenced. |

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| Institution | Harvard Medical School |
| City | Boston, MA |
| Overall Grade | B |
| Overall Comments | In 2009, Harvard Medical School submitted its own policies and those of affiliated hospitals, including Partners Healthcare and Children's Hospital, Boston. Harvard does not operate its own clinical facilities, and has many affiliate institutions, each of which has its own policies and practices. In scoring this institution -- especially in the clinical domains -- we took this structure into consideration. HMS addresses, on some level, most of the domains on which it was scored. A detailed system has been developed to disclose and address conflicts of interest due to external relationships. While conflicts of interest are effectively addressed for most of the HMS faculty and students by affiliated institutions' policies, the complicated patchwork of rules may hinder their effectiveness to ameliorate conflicts of interest. As some other AMCs have done, HMS could implement its own strong policies to be applied to all clinical settings in which its faculty and students work and train. This institution made a submission for the first time to the AMSA PharmFree Scorecard in 2009. Their grade improves from an F to a B. Harvard Medical School received an F in 2008 because it did not submit policies, and indicated that it did not have applicable policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 While this institution does not have its own comprehensive gifts policy, Partners HealthCare, which operates clinical sites for a large proportion of HMS faculty and trainees, bans gifts that do not serve patient care or educational purposes. All educational and patient care-related gifts must be approved by the Department Chief and must have a value less than \$100. |
| Consulting- Score & Comments | 2 This institution has an extensive policy on external consulting that limits or bans many inappropriate types of relationships. Pre-approval of consulting agreements is required. |
| Speaking- Score & Comments | 1 While HMS policies do not explicitly address "speaker's bureaus," Partners HealthCare's policy on external consulting requires pre-approval of speaking relationships in certain circumstances. Another clinical affiliate requires that lecture content not be subject to industry control. |
| Disclosure- Score & Comments | 2 All HMS Faculty of Medicine are required to submit disclosure forms periodically, as well as when situations requiring disclosure arise. |
| Samples- Score & Comments | 2 Partners HealthCare's drug samples policy only allows samples to be distributed directly to physicians in limited circumstances, as part of approved programs. |

| Institution | Harvard Medical School |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 All Partners HealthCare formulary committees must at a minimum require members to disclose potential conflicts of interest and abstain from voting in situations in which they may have a conflict. |
| Sales Reps- Score & Comments | 2 Partners HealthCare policies restrict industry representative access to Partners HealthCare sites. Interactions are limited to pre-scheduled appointment times, and are only permitted in non-patient care areas. |
| On Campus- Score & Comments | 1 HMS policies do not provide details on the management of education funding from outside sources, however they do address some strategies to handle conflicts of interest in CME, by providing examples from ACCME resources on the subject. This policy does not state that ACCME requirements apply to all (i.e. including non-accredited) educational events. |
| Off Campus- Score & Comments | 2 HMS policies do not directly address the issue of commercial support for off-site education in its policies. Affiliated clinical sites prevent direct compensation or reimbursement for attendance or related costs. |
| Industry Support- Score & Comments | 2 HMS policies do not place explicit restrictions on scholarships or trainee funds. Affiliated clinical sites allow scholarships to trainees, but prevent "earmarking" the funds for individuals. |
| Curriculum- Score & Comments | 2 HMS provided information on sessions and courses that address conflicts of interest in medicine. The sessions that most directly address pharmaceutical marketing, however, do not appear to be part of required courses, suggesting that education on this issue has not been institutionalized. |
| Oversight- Score & Comments | 1 HMS will create a Standing Committee on Conflicts of Interest and Commitment to assist with the implementation of conflict of interest policies and will be responsible for reviewing cases brought to the attention of the Office of the Dean. |
| Non-Compliance- Score & Comments | 1 The Standing Committee will have the opportunity to make recommendations for further action to the Office of the Dean in circumstances of noncompliance. |

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| Institution | Howard University College of Medicine |
| City | Washington, DC |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Howard University College of Medicine |
|------------------------------------|---------------------------------------|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | Indiana University School of Medicine |
| City | Indianapolis, IN |
| Overall Grade | I |
| Overall Comments | In 2009 this institution demonstrated an ongoing policy development process, allowing their In Process designation to be extended beyond one year. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Indiana University School of Medicine |
|------------------------------------|---------------------------------------|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | Johns Hopkins School of Medicine |
| City | Baltimore,MD |
| Overall Grade | A |
| Overall Comments | Johns Hopkins School of Medicine has a set of very strong policies governing the relationships between its medical staff and the pharmaceutical industry. Particular highlights include language ensuring independent content at speaking engagements paid by industry, a complete ban on pharmaceutical samples and vouchers, and a detailed, strict policy requiring the recusal of staff from purchasing decisions up to one year after a conflict of interest has occurred. This institution also has a detailed policy on reporting, however this policy designates multiple specific situations where reporting is required, allowing certain types of external relationships to go unreported, or certain types of staff (non-researchers) to report less. Requiring all staff to report all external interest on a periodic basis would not only reduce the burden of staff compliance, it would ensure that any potential conflicts of interest would not be missed. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from a D to an A. This institution has not consented to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 In general, gifts and on-site meals from industry are prohibited, though certain exceptions apply. Unbranded textbooks and anatomical models and illustrations may be given by industry if distributed through the department or the medical school. Meals are prohibited both on-site and at professional activities off-site. Exceptions to this rule are meals associated with accredited CME, when providing legitimate consulting services, at professional society meetings, and during meetings for ongoing research projects. In addition, in-kind gifts may be given to the institution or department after review by legal counsel. |
| Consulting- Score & Comments | 3 Consulting relationships must be described in a formal contract, must be reported in advance and reviewed by the department head, and then further reported to the Office of Policy Coordination. Compensation for consulting without commensurate services is considered a gift and is prohibited |
| Speaking- Score & Comments | 2 This policy is exemplary in its regulation of paid speaking engagements with industry. Faculty must retain "full control and authority over professional material the faculty member presents and does not allow such communications or presentations to be subject to prior approval by any commercial interest. While this policy prohibits faculty from receiving compensation to act as a spokesperson for an industry product, it does not fully prohibit speakers' bureaus or long-term speaking arrangements with industry. |
| Disclosure- Score & Comments | 1 The Policy on Conflict of Commitment and Conflict of Interest requires that disclosures of certain, but not all, activities be made. For example, contractual consulting must be reported in advance and reviewed, as well as all activities whenever aggregate time for these external commitments is about to exceed 26 days per year. The policy on conflict of interest governs the external relationships of researchers, and requires a comprehensive annual reporting of relationships. However this policy applies only to researchers, not all faculty and staff. Because there is no requirement for all staff to file periodic disclosures on external relationships/potential conflicts broadly, a 1 must be given for this domain. |
| Samples- Score & Comments | 3 Exemplary. "The practice of accepting free pharmaceutical samples risks interference with one's prescribing practices since industry representatives often provide the newest and most costly drugs. Therefore free pharmaceutical samples and vouchers for free pharmaceutical samples may not be accepted." Johns Hopkins has planned to phase-in this new and commendable policy over the course of one year. |

| Institution | Johns Hopkins School of Medicine |
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| Purchasing- Score & Comments | 3 Exemplary. Individuals with financial conflicts of interest must recuse themselves from relevant purchasing decisions for at least one year after the receipt of the last payment from the company in question, one year after an immediate family member terminates employment with the company, or for as long as an individual has equity interest in the company. |
| Sales Reps- Score & Comments | 2 Industry sales representatives may come on-site by invitation only, and are restricted to non-patient care areas (except for the purpose of training on devices). |
| On Campus- Score & Comments | 2 Although the Office of Continuing Medical Education most process all requests for, and receive all industry funds given in support of continuing education, the policy does not state that industry may not influence how such funds are used. Unrestricted funds from industry in support of unaccredited educational events must be reviewed by the Vice Dean for Education to ensure educational value. These funds must go to departmental accounts, which can allow for funding bias in topic selection. Of additional note is this institution's detailed policy for dealing with conflict of interest of presenters at accredited CME events, which includes review of presentation materials and in some cases requested revisions or other corrective actions. |
| Off Campus- Score & Comments | 3 The institution's gifts policy prevent s personnel from accepting payment to attend at off-site events, nor may personnel accept industry funds to travel off site unless providing contractual services. Students may use unrestricted funds from industry for such travel, but industry may not select who receives this travel support. In general, faculty, students and staff are strongly discouraged from attending promotional speaking events off-site, and if they do so should pay for their own meals. |
| Industry Support- Score & Comments | 3 Award from industry are permitted, but the evaluation and selection of recipients may only be conducted by the School of Medicine. |
| Curriculum- Score & Comments | 2 Each JHM entity must publicize the policy to al personnel. However there is no stipulation requiring education on the influence of the pharmaceutical industry on the medical profession, nor curricular materials provided to this effect. |
| Oversight- Score & Comments | 1 Oversight is established through the Office of Policy Coordination |
| Non-Compliance- Score & Comments | 1 This policy makes reference to sanctions. |

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|------------------------------|--|
| Institution | Kansas City University of Medicine and Biosciences - College of Osteopathic Medicine |
| City | Kansas City, MO |
| Overall Grade | F |
| Overall Comments | This institution has indicated it does not possess policies relevant to the assessed scorecard domains. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Kansas City University of Medicine and Biosciences - College of Osteopathic Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Keck School of Medicine of the University of Southern California |
| City | Los Angeles, CA |
| Overall Grade | B |
| Overall Comments | Keck School of Medicine's conflict of interest policies are, on the whole, quite strong. There is a complete ban on gifts and on-site meals. P although the policy does not ban participation in speaker's bureaus outright. Further reducing the marketing impact of samples (by limiting their use or providing equal access to generic samples) would also improve this institution's overall grade. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009, and submitted updated materials after the 2009 Scorecard release. These updated materials improved this institution's score in domains on speaking relationships, disclosure, and curriculum. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 1/05/2010 |
| Gifts- Score & Comments | 3 This institution has a total ban on gifts and on-site meals. |
| Consulting- Score & Comments | 3 An excellent consulting policy requires prior review and approval of a written agreement before any consulting relationship may commence. Additionally, compensation for consulting services must be at or below fair market value, and is only allowed for legitimate services. |
| Speaking- Score & Comments | 2 The policy states that faculty may engage in industry-sponsored speaking relationships as long as industry does not have any influence on presentation content and it complies with ACCME, ACPE, or ADA standards, as appropriate, whether CME credit is issued or not. Additionally, all speaking engagements must receive prior approval, a commendable policy. Were long-term promotional speaking relationships, such as speaker's bureaus, to be completely prohibited (rather than strongly discouraged), this otherwise very strong policy would score a 3 in this domain. |
| Disclosure- Score & Comments | 2 All consulting relationships, speaking relationships, service on advisory committees (and any other service to industry for payment) must be disclosed to the institution for prior approval, and to students, residents and fellows when the relationship is related to a product discussed in an educational setting. For a three in this domain, public disclosure or disclosure to patients could be included. |
| Samples- Score & Comments | 2 Pharmaceutical samples must be dispensed from a central location, and may not be accepted directly by physicians from industry sales representatives. |

| Institution | Keck School of Medicine of the University of Southern California |
|------------------------------------|---|
| Purchasing- Score & Comments | 3 This institution takes a strong stance in the area of purchasing/formularies, by requiring committee members to disclose any relationships with industry and recuse themselves from any decisions pertaining to these relationships. |
| Sales Reps- Score & Comments | 2 Industry sales representatives may only meet with faculty by appointment and in non-patient care areas. |
| On Campus- Score & Comments | 2 ACCME standards are used as a benchmark for on-site educational activities. Additionally, the policy specifies that monies coming from industry sales and marketing departments should only be accepted in special circumstances. |
| Off Campus- Score & Comments | 3 Conference attendees must not accept any reimbursement from industry for travel to off-site events. |
| Industry Support- Score & Comments | 3 Recipients of trainee funds or scholarships must be selected by the institution. All funds must be processed through the institution and must not be given to the recipient directly from industry. |
| Curriculum- Score & Comments | 3 This institution provides a senior seminar on policies governing industry relationships with medical professionals. Students must read materials on industry relationships and the potential influence of those relationships, and understand the perspectives of various university stakeholders in the formation of an industry-interaction policy. Other curriculum covers direct to consumer advertising and drug development. |
| Oversight- Score & Comments | 0 No oversight or responsible party specified in this policy. |
| Non-Compliance- Score & Comments | 1 Sanctions for noncompliance are referenced. |

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|------------------------------|--|
| Institution | Lake Erie College of Osteopathic Medicine |
| City | Erie, PA |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Lake Erie College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Lincoln Memorial University – DeBusk College of Osteopathic Medicine |
| City | Harrogate, TN |
| Overall Grade | I |
| Overall Comments | This institution has informed us that they are revising or developing new policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Lincoln Memorial University – DeBusk College of Osteopathic Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | Loma Linda University Adventist Health Sciences Center |
| City | Loma Linda. CA |
| Overall Grade | B |
| Overall Comments | <p>This Institution has strong and unequivocal gifts and meals ban, a good firewall on purchasing decisions, and an important requirement that all consulting and participation at conferences and meetings be pre-approved. This language could be made stronger by explicitly including all speaking engagements in the pre-approval requirement, and banning speaker's bureaus, rather than just warning against them. As this institution seems to recognize samples' use as a marketing tool, officials there would do well to prohibit their use, or put in place a program that breaks the gifting link between physicians and drug reps, and promotes the used of well-tested, older therapies. This institution submitted policies for the first time on September 28th, 2009. Prior to this date, this institution was In Process for one year. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 12/4/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>This institution has established an unequivocal ban on gifts and meals.</p> |
| Consulting- Score & Comments | <p>3</p> <p>All consulting arrangements must be approved by the institution before initiation, must be documented in a formal contract with specific deliverables, and payment must be commensurate to those deliverables.</p> |
| Speaking- Score & Comments | <p>2</p> <p>Though strong language cautions against the use of speakers bureaus as marketing tools, this institution does not prohibit them. Though the policy does require that all content and its development be under the sole control of the presenter, who must disclose financial support from industry to audience, other firewalls that would limit faculty from having long-standing speaking arrangements with industry are absent.</p> |
| Disclosure- Score & Comments | <p>1</p> <p>This AMC requires that faculty annually disclose financial relationships if they garner more than \$1000 cumulatively, a floor under which there is considerable room for industry influence; furthermore, requiring only faculty to disclose fails to capture industry ties among numerous other individuals involved in medical education, including staff, residents, and adjuncts. The policy cedes further management of disclosures to "cost centers," and clarity on this structure would be useful.</p> |
| Samples- Score & Comments | <p>1</p> <p>This institution discourages the use of samples, acknowledging within the policy their use as a marketing tool, but does nothing to actively restrict or regulate their use or acceptance as such.</p> |

| Institution | Loma Linda University Adventist Health Sciences Center |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 Purchasing committee members with financial conflicts must disclose the conflicts to the P&T committee and recuse themselves in all decisions affecting companies and products with which they have an interest. |
| Sales Reps- Score & Comments | 2 Pharmaceutical sales representatives are allowed on-site by appointment only. |
| On Campus- Score & Comments | 2 All events that receive industry funding, whether or not CME-accredited, must abide by ACCME regulations, including the Standards for Commercial Support. Additionally, industry may not provide food at any CME or other event, and AMC faculty and staff are prohibited from accepting such meals elsewhere |
| Off Campus- Score & Comments | 3 Accepting industry payments to attend off-site conferences and events is prohibited. The dept, division or program retains total control over recipients of industry travel support, and the dept. chair must validate the educational worth of an event. |
| Industry Support- Score & Comments | 2 This is a strong scholarship policy that prevents earmarking or quid pro quos for industry funds, but an exception that the institution may cede control of choosing recipients for national or regional merit-based scholarships seems unnecessarily broad and could open the door to undue industry influence on scholar selection. |
| Curriculum- Score & Comments | 1 No curricular material submitted. |
| Oversight- Score & Comments | 0 No oversight stipulated. |
| Non-Compliance- Score & Comments | 0 No sanctions established. |

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|------------------------------|--|
| Institution | Louisiana State University School of Medicine - New Orleans |
| City | New Orleans, LA |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Louisiana State University School of Medicine - New Orleans |
|------------------------------------|---|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Louisiana State University School of Medicine - Shreveport |
| City | Shreveport, LA |
| Overall Grade | F |
| Overall Comments | This institution responded to the request for policies by noting they had no policies for any of the assessed domains. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Louisiana State University School of Medicine - Shreveport |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Loyola University of Chicago Stritch School of Medicine |
| City | Chicago, IL |
| Overall Grade | B |
| Overall Comments | In general, this school's policy focuses a great deal on disclosure of possible conflicts of interest, as well as supervisory approval for many activities that are likely to pose a conflict of interest. This institution's policy is particularly strong in the area of consulting, as all consulting services must be disclosed, approved by a supervisor, and subject to a written contract. However, other policy areas have only moderate potential to limit conflict of interest with regards to the pharmaceutical industry. Although on-site meals are banned, gifts are not adequately limited. Additionally, there is no evidence that the influence of the pharmaceutical industry is included in the medical school curriculum. Loyola University of Chicago Stritch School of Medicine submitted revised policies for the 2009 AMSA PharmFree Scorecard. Their grade improves from a D to a B. This institution has not consented to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 On-site meals funded by industry are banned, but the policy does not substantially limit gift giving to faculty and staff. |
| Consulting- Score & Comments | 3 A very good policy. Consulting services provided to a specific company must be limited; compensation must not exceed fair market value; and all services provided must be disclosed, approved by a supervisor, and subject to a written contract. |
| Speaking- Score & Comments | 2 Industry personnel are prohibited from writing or directing the content of speeches given by AMC personnel in Speaker's Bureaus. All speaking arrangements require prior approval and a written contract. |
| Disclosure- Score & Comments | 2 All faculty and staff are required to disclose all financial ties with private industry on an annual basis. |
| Samples- Score & Comments | 3 A newer policy states that Industry representatives are prohibited from distributing pharmaceutical samples anywhere on campus. Care should be taken to update older policies to conform with this rule to avoid confusion. |

| Institution | Loyola University of Chicago Stritch School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 2 Key personnel, including those making formulary decisions, must have their annual disclosures personally reviewed by the chief compliance officer. Further, any physician requesting that a new drug be added to the formulary must declare any potential conflicts of interest along with their request. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are allowed in the medical center by appointment only. They are allowed in some specified patient care areas only for "bona fide" reasons. |
| On Campus- Score & Comments | 2 Supervisors must approve requests for on-site educational event funding from industry. Industries are prohibited from choosing the topic(s) and speaker(s) for the event. |
| Off Campus- Score & Comments | 2 Supervisors must approve attendance at industry-sponsored off-site events, and "meals, receptions, and hospitality should be modest in value and the 'per person' expense should not exceed \$50." |
| Industry Support- Score & Comments | 1 Industry funding of scholarships must be "coordinated with the Office of Development", but no oversight is specified and there are no other significant limits evident on the ability of industry to choose recipients. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 1 This policy establishes oversight. |
| Non-Compliance- Score & Comments | 1 This policy establishes sanctions. |

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| Institution | Marshall University Joan C. Edwards School of Medicine |
| City | Huntington, WV |
| Overall Grade | F |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 1 No policy provided. The School of Medicine enclosed the AMA Handbook, but unclear whether these guidelines have been codified. |
| Consulting- Score & Comments | 1 Consulting is discussed only in disclosure policy. |
| Speaking- Score & Comments | 1 Speaking relationships are covered only in disclosure policy. |
| Disclosure- Score & Comments | 1 Disclosure measures are referenced only for CME-related work (see speaking and consulting); no policy requiring general disclosure. |
| Samples- Score & Comments | 1 No policy, or policy not provided. |

| Institution | Marshall University Joan C. Edwards School of Medicine |
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| Purchasing- Score & Comments | 1 The policy concerning recusal of individuals with conflicts from planning CME activities does not apply to purchasing and formulary committees. |
| Sales Reps- Score & Comments | 1 No policy, or policy not provided. |
| On Campus- Score & Comments | 1 Provided policy applies only to ACCME accredited events. |
| Off Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 1 The submitted form concerning CME content does not constitute medical school curriculum. |
| Oversight- Score & Comments | 0 No policy, or policy not provided. |
| Non-Compliance- Score & Comments | 0 No policy, or policy not provided. |

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| Institution | Mayo Medical School - College of Medicine |
| City | Rochester, MN |
| Overall Grade | A |
| Overall Comments | As a whole, this institution's policies are exemplary. Strong policies with defined areas that many other schools do not address are the norm for Mayo. Notable policies include those governing gifts, consulting relationships, and pharmaceutical samples. The inclusion of outstanding curriculum materials also is a highlight. Improvement could be made in unclear language in policies regarding industry representatives and on site education. Mayo Medical School submitted revised policies to the 2009 AMSA PharmFree Scorecard, elevating their scores in many domains. Their grade has improved from a D to an A. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 Any gifts or on-site meals paid for by vendors or pharmaceutical representatives are not permitted. |
| Consulting- Score & Comments | 3 An extremely detailed and comprehensive policy. Consulting is permitted, with various restrictions, including review of all relationships by the Medical-Industry Relations Committee. Prior to the start of all formal consulting relationships, a contract clearly describing the services to be provided at fair market value must be signed by all parties (including Mayo). For consulting relationships with fees that are \$10,000 per company per year or per activity, quarterly invoices describing all activities, payments and time spent must be submitted to the Medical-Industry Relations Committee as long as the relationship lasts. If the consultant is also conducting concurrent research with the same company, the consulting fees must be paid through the Foundation for Medical Education and Research, and will from there be allocated to the consultant. |
| Speaking- Score & Comments | 2 It appears that most speaking engagements fall under the detailed consulting rules, with speaker's bureaus being explicitly banned. However, nowhere does this policy clearly state that industry is not permitted to control presentation content. |
| Disclosure- Score & Comments | 2 Annual internal disclosure of all relationships with commercial entities is required of all physicians, administrative staff, voting/consulting staff, fellows and research associates. Also, although personnel are not required to disclose all relationships to patients, patients may ask the Conflict of Interest review board for their physician's conflicts of interest. |
| Samples- Score & Comments | 3 Samples are not permitted except for investigational purposes that are approved by IRB research protocols. |

| Institution | Mayo Medical School - College of Medicine |
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| Purchasing- Score & Comments | 3 Members of the Pharmaceutical Formulary Committee must recuse themselves from any decision regarding a commercial entity with whom they have a financial relationship. |
| Sales Reps- Score & Comments | 2 Industry representatives are only permitted to enter the facility with a scheduled appointment. |
| On Campus- Score & Comments | 2 All CME activities planned by the institution's School of CME are subject to institutional review. All industry funding must come in the form of educational grants, which the course director will direct. |
| Off Campus- Score & Comments | 3 Citing AMA guidelines, the institution does not allow direct or indirect subsidies to pay the costs of travel, meals or lodging for conference attendees. |
| Industry Support- Score & Comments | 3 Unrestricted funds may be provided to Mayo for use as scholarships for attendance at conferences provided the recipient of the funds is chosen by the program director. |
| Curriculum- Score & Comments | 3 In the exemplary curriculum materials provided, Mayo Medical School showed that one of its major educational goals is to fully educate students on both how conflicts of interest arise and what the institutional policies are. |
| Oversight- Score & Comments | 1 There are clear parties for oversight. Mayo also has both a Compliance Hotline and an Internet reporting site for anonymous reporting of offences. |
| Non-Compliance- Score & Comments | 1 Sanctions for non-compliance are clearly outlined. |

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| Institution | Medical College of Georgia School of Medicine |
| City | Augusta, GA |
| Overall Grade | B |
| Overall Comments | While it does not go far enough to ban gifts outright, limit drug samples as a marketing tool, or establish sufficient firewalls in procurement, this policy makes good strides in the area of speaking and consulting relationships. These areas would be made even stronger if all financial relationships were disclosed under the annual disclosure policy, not just payments above \$10,000. This institution's evaluation was last updated: 10/2/2009 |
| Gifts- Score & Comments | 2 School of Medicine employees may accept gifts that total below a \$25 threshold per year; university recipients are limited to \$100 threshold. |
| Consulting- Score & Comments | 2 Consulting arrangements must receive prior approval from dean and dept. chair "within specified time limits," but no payment or contract requirements are established. |
| Speaking- Score & Comments | 3 This policy explicitly stipulates that faculty may only present for an event sponsored or partially-sponsored by industry if "the activity "is not an Industry-sponsored "speaker's bureau" (i.e., a contractual relationship to give talks in which the topic(s) and/or content are provided by the company), and if the "participant is not required by an Industry sponsor to accept advice or services concerning speakers, content, etc., as a condition of the sponsor's contribution of funds or services." |
| Disclosure- Score & Comments | 1 Only significant financial interests as described by current NIH rules (\$10,000) are required to be disclosed annually. |
| Samples- Score & Comments | 2 Samples must be controlled by the pharmacy. |

| Institution | Medical College of Georgia School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 2 Individuals having a direct role making institutional decisions on equipment or drug procurement must disclose to the purchasing unit or selection committee any financial interest they or their immediate family have in companies that might benefit from the decision. The purchasing unit, following the applicable guidelines, will decide whether the individual must recuse him/herself from the purchasing decision. |
| Sales Reps- Score & Comments | 2 Industry representatives are allowed on-site only by appointment in non-patient care areas. |
| On Campus- Score & Comments | 2 All CME-accredited activity must adhere to ACCME guidelines, and "Industry support may not influence curriculum in any way" of non-CME accredited activity. Additionally, "Support must be designated for a broadly defined topic (e.g., cardiology, psychiatry, neurosurgery) or recurring educational activity (e.g., grand rounds). Support may not be designated for a specific topic, speaker or activity. "In kind" Industry support such as equipment and supplies may be designated to an activity. |
| Off Campus- Score & Comments | 3 Students and staff may not accept payment for attendance at industry-sponsored events. |
| Industry Support- Score & Comments | 3 This policy requires that the institution have sole responsibility for selecting the recipient of scholarship funds, and that the recipient of any industry-funded scholarship not be subject to any quid pro quo. |
| Curriculum- Score & Comments | 3 Curricular materials provided cover industry marketing's influence on medical decision-making as well as conflicts of interest in research. |
| Oversight- Score & Comments | 1 This policy establishes oversight. |
| Non-Compliance- Score & Comments | 1 This policy establishes sanctions for non-compliance. |

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| Institution | Medical College of Wisconsin |
| City | Milwaukee, WI |
| Overall Grade | B |
| Overall Comments | <p>Most of the scorecard domains are addressed by Medical College of Wisconsin in a strong and straightforward way. Commendable policies developed over the past year include a new gifts ban and a prohibition of the direct receipt of samples by doctors as well as policies on attendance at off-site events. However some ambiguities remain, including regulation of speaking relationships, purchasing and formulary committees, and industry donations. Also, while there is a clear chain-of-command for dealing with conflicts as they arise, the Office of Compliance is not required to be highly active in seeking those conflicts out. In 2008 the policies of this institution were under review. Final policies provided for 2009 show broad improvements over draft policies submitted for provisional assessment. This institution moves from an in-process designation to a grade of B. This institution has not consented to allow portions of their policy be cited for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>According to the most recent policy, gifts, including all meals, textbooks, and equipment, may not be accepted at any time. Although the Code of Conduct does make an exception for gifts of nominal value, the newer and more stringent policy was assumed to have precedence. The Code of Conduct should be updated to reflect the new policy.</p> |
| Consulting- Score & Comments | <p>1</p> <p>The only restriction on consulting relationships is disclosure. Stronger policies would include institutional review and a requirement for formal contract.</p> |
| Speaking- Score & Comments | <p>2</p> <p>Speaking relationships are not explicitly addressed anywhere in this policy. However, 'de facto employment' requires prior approval from the school and 'Covered Persons' at the school are required to receive fair market value for services rendered.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>This policy requires annual internal disclosure of any potential conflicts of interest, as well as any outside activities that resulted in payment. However, conflicts of interest are not clearly defined in this policy.</p> |
| Samples- Score & Comments | <p>2</p> <p>Samples cannot be accepted by physicians, under the gifts policy, but samples for use in clinics or clinical trials can be accepted by the Medical Director for distribution and use.</p> |

| Institution | Medical College of Wisconsin |
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| Purchasing- Score & Comments | 2 Although this policy makes an effort to restrict conflicted individuals from making purchasing decisions at the school, there is no clear policy concerning P&T committees and it is unclear how the present policy would apply. |
| Sales Reps- Score & Comments | 2 Industry representatives are only permitted to meet with faculty in non-clinical areas by appointment. They must be supervised by the faculty member who scheduled their visit. |
| On Campus- Score & Comments | 2 Although all contributions must be made to the central CME office, this policy does not clearly prevent industry from earmarking where their donations go. |
| Off Campus- Score & Comments | 3 Travel cost payments are defined as gifts and banned |
| Industry Support- Score & Comments | 3 Students, residents and post-doc fellows may receive industry funding, but the funds must go through the central department and may not be earmarked by industry. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 1 Although the Office of Compliance is responsible for oversight, it does not appear to be very active in seeking out conflicts. |
| Non-Compliance- Score & Comments | 1 There is a clear sanctions policy. |

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| Institution | Medical University of South Carolina |
| City | Charleston, SC |
| Overall Grade | B |
| Overall Comments | <p>With strong policies regarding purchasing and formulary committees and scholarship funds, the Medical University of South Carolina has good language corresponding with most of the scorecard domains. However, strengthening and addressing off-site education and consulting relationships would improve the overall policy. Medical University of South Carolina submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade improves from an I to a B. An updated policy submitted on June 16, 2009 by the institution has reiterated the strong policy language in the original submission, and has not affected the institution's grade. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>All meals directly from industry representatives are banned, as well as all gifts with a value greater than \$25.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>Although consulting relationships must be disclosed, there are no further policies described.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>Although the institution strongly discourages participation in speaker's bureaus, they are not banned. However, faculty taking part must confirm that the lecture content is not subject to industry approval, that it is based on the best scientific evidence and that the vendor doesn't choose who will speak at the event. They must also be paid at fair market value.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>All faculty and staff are required to annually disclose any real or potential conflicts of interest. The institution is also creating a system to submit disclosure forms online.</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>Samples must be delivered to the pharmacy and must be dispensed and controlled from the pharmacy. However, physicians are permitted to receive samples that are not required to be recorded for personal use.</p> |

| Institution | Medical University of South Carolina |
|------------------------------------|---|
| Purchasing- Score & Comments | 3 Any person with a financial interest in a manufacturer of pharmaceuticals or goods is required to disclose those interests and recuse themselves from any relevant purchasing decisions. |
| Sales Reps- Score & Comments | 2 Industry representatives are permitted on-site in non-patient care areas by appointment only. |
| On Campus- Score & Comments | 2 The institution adheres to ACCME standards for its CME activities. |
| Off Campus- Score & Comments | 2 Although the institution does not prohibit payment for attendance, travel funds provided by industry must be described in a contract. |
| Industry Support- Score & Comments | 3 All industry funding of scholarships will be deposited into a separate account. It will then be at the sole discretion of the department to award the scholarship, with no quid pro quo for the selected recipients. |
| Curriculum- Score & Comments | 2 Curriculum provided was based on Clinical Ethics. |
| Oversight- Score & Comments | 1 The Office of Compliance is responsible for oversight. |
| Non-Compliance- Score & Comments | 1 Sanctions for noncompliance were noted. |

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| Institution | Meharry Medical College |
| City | Nashville, TN |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Meharry Medical College |
|------------------------------------|-------------------------|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Mercer University School of Medicine |
| City | Macon, GA |
| Overall Grade | C |
| Overall Comments | Mercer University School of Medicine has strong policies concerning industry funds for trainees and off-site education. However, the consulting and samples domains were not addressed at all in this policy and no oversight body or sanctions were noted. Mercer University School of Medicine submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade improves from an F to a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 Personal gifts from industry may not be accepted. However, there is no mention of on-site meals. |
| Consulting- Score & Comments | 1 No applicable policy for consulting was provided. |
| Speaking- Score & Comments | 2 Although speaker's bureaus are not banned, the speaker must be the sole determinant of the lecture content. |
| Disclosure- Score & Comments | 1 No applicable policy for disclosure. |
| Samples- Score & Comments | 1 No applicable policy for samples. |

| Institution | Mercer University School of Medicine |
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| Purchasing- Score & Comments | 2 |
| | P&T Committee members are required to disclose their conflicts of interest to the rest of the committee, who will then vote on whether the member should recuse him/herself for the applicable decision. |
| Sales Reps- Score & Comments | 2 |
| | Industry representatives are only permitted in non-patient care areas by appointment. |
| On Campus- Score & Comments | 2 |
| | The institution cites ACCME standards for all CME events whether or not CME credit is awarded. |
| Off Campus- Score & Comments | 3 |
| | Individuals may not accept compensation (including defraying of costs) for solely attending a CME or other activity. |
| Industry Support- Score & Comments | 3 |
| | The applicable department will receive the scholarship funds and select the recipient of the scholarship without any input from the industry donor. |
| Curriculum- Score & Comments | 2 |
| | Although no curriculum was provided, the institution's policy states that all students, residents, trainees and staff will receive training on potential conflicts of interest with industry. |
| Oversight- Score & Comments | 0 |
| | No party for oversight was noted. |
| Non-Compliance- Score & Comments | 0 |
| | No sanctions for noncompliance were noted. |

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| Institution | Michigan State University College of Human Medicine |
| City | East Lansing, MI |
| Overall Grade | I |
| Overall Comments | Michigan State University College of Human Medicine has informed us that they are revising or developing their policies, and have provided further material for review in addition to an initial provisional submission. Draft policies provided by this institution go far in addressing the potential inappropriate industry relationships by banning participation in speakers' bureaus and ensuring consulting relationships meet certain standards. However, these policies do not address on-site education, and the samples policy does not limit the use of samples as a marketing tool. In their current form, institutional policies allow departments and individual clinics to develop their own policies in some domains. MSUCHM submitted policies for the first time to the AMSA PharmFree Scorecard in February 2009, and submitted additional draft policies for review in September 2009. Their status is in process. Their provisional grade is a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 11/25/2009 |
| Gifts- Score & Comments | 2 Policy prohibits acceptance of industry gifts and meals valued above an undefined de minimis threshold. Notably, promotional industry items may not be displayed in patient care areas. |
| Consulting- Score & Comments | 3 Consulting relationships with industry must be described in a formal contract and approved by the institution. In addition, only fair market rates may be paid for consulting services. |
| Speaking- Score & Comments | 3 Employees may only participate in paid speaking engagements if the content and format of the presentation is entirely free of industry control. |
| Disclosure- Score & Comments | 2 Institutional policy requires annual disclosure of financial relationships related to academic responsibilities, education, clinical research and patient care. |
| Samples- Score & Comments | 1 An existing samples policy requires detailed tracking and safe use actions. The draft policy would require that samples only be distributed in accordance with guidelines developed by individual clinics. It is not clear whether clinic policies would limit the use of samples as a marketing tool.. |

| Institution | Michigan State University College of Human Medicine |
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| Purchasing- Score & Comments | 1 This institution does not operate a formulary. |
| Sales Reps- Score & Comments | 2 In general, this institution prohibits visits by industry sales representatives, however individual departments and clinics may create allowances for these interactions. |
| On Campus- Score & Comments | 1 No policy provided. |
| Off Campus- Score & Comments | 3 Gifts, meals, payments and travel support are not permitted outside of reimbursement of expenses when presenting |
| Industry Support- Score & Comments | 3 Recipients of scholarships or trainee funds are to be selected by the institution, and not by industry. |
| Curriculum- Score & Comments | 2 Materials provided suggest that the curriculum addresses conflicts of interest due industry marketing in a limited manner. |
| Oversight- Score & Comments | 1 Oversight is referenced. |
| Non-Compliance- Score & Comments | 1 Sanctions are referenced. |

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|---|---|
| Institution | Michigan State University College of Osteopathic Medicine |
| City | East Lansing, MI |
| Overall Grade | I |
| Overall Comments | Michigan State University College of Osteopathic Medicine has submitted a draft policy only, that has not yet been implemented. By our provisional assessment, MSUCOM's policy is strong with regards to scholarship and trainee funds, as all recipients must be selected by the university and not by the industry. However, the policies for all other domain areas are generally weak. Some domain scores could be improved by using stronger language: for example, receipt of gifts is "strongly discouraged," but not explicitly banned. Because this is a draft policy only, however, we hope that MSUCOM will consider further strengthening its policies before final implementation. MSUCOM has submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their provisional grade is an F, but they will remain In Process until implementation of their draft policies, at which point a final assessment will be made. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 This institution's language on the acceptance of gifts is weak. Accepting gifts is discouraged, but not prohibited. |
| Consulting- Score & Comments | 1 All consulting relationships will be disclosed ultimately to the Conflict of Interest Committee, who will review the relationship to ensure that no policy violations have occurred. However, review/approval is not required in advance, and there are no requirements for formal contracts or that payment be commensurate to the task. |
| Speaking- Score & Comments | 1 The source and amount of money that are received by faculty for speaking engagements must be disclosed, but not necessarily reviewed and approved. Participation in speaker's bureaus is not prohibited, and there are no other more stringent limitations on speaking engagements. |
| Disclosure- Score & Comments | 1 No policy or policy not provided. |
| Samples- Score & Comments | 1 No policy or policy not provided. |

| Institution | Michigan State University College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 This institution does not operate a formulary. |
| Sales Reps- Score & Comments | 1 All visits by industry representatives will be logged, and the log will be reviewed by the Department Chair annually; however, this policy is not enough to meaningfully regulate faculty interaction with industry representatives. |
| On Campus- Score & Comments | 1 The institution has noted that they defer to the policies of their CME office, which are in compliance with ACCME standards. However, this policy has not been provided. |
| Off Campus- Score & Comments | 1 No policy or policy not provided. |
| Industry Support- Score & Comments | 3 Recipients of scholarships or trainee funds are to be selected by the institution, and not by industry. |
| Curriculum- Score & Comments | 1 The policy states that curriculum will be required to cover evidence-based medical practice and the use of independent, unbiased sources of information. However, this does not necessarily require that conflict of interest for medical professionals and pharmaceutical marketing be covered in the curriculum. |
| Oversight- Score & Comments | 1 Oversight is referenced |
| Non-Compliance- Score & Comments | 1 Sanctions are referenced |

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| Institution | Miller School of Medicine, University of Miami |
| City | Miami, FL |
| Overall Grade | B |
| Overall Comments | 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 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 or the dean. |
| Speaking- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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. |

| Institution | Miller School of Medicine, University of Miami |
|------------------------------------|---|
| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 2 Industry representatives are allowed on-site, but by appointment only and not in patient-care areas. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 1 The School of Medicine notes that curriculum development is in process. |
| Oversight- Score & Comments | 1 Clear, model language is used to designate oversight, placing responsibility with department chairs. |
| Non-Compliance- Score & Comments | 1 Brief but clear hierarchical sanctions laid out for practitioners and staff who violate institutional policy including reprimands, salary fines, and termination. |

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| Institution | Morehouse School of Medicine |
| City | Atlanta, GA |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Morehouse School of Medicine |
|------------------------------------|------------------------------|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | Mount Sinai School of Medicine |
| City | New York, NY |
| Overall Grade | A |
| Overall Comments | <p>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. Mount Sinai School of Medicine provided updated policies covering consulting relationships and curriculum for the 2009 AMSA PharmFree Scorecard. Their grade remains an A. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>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.</p> |
| Consulting- Score & Comments | <p>3</p> <p>Consulting relationships must be described in a written contract, and there are limits as to how frequently and for how long a physician may serve as a consultant.</p> |
| Speaking- Score & Comments | <p>2</p> <p>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.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>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.</p> |
| Samples- Score & Comments | <p>3</p> <p>Samples are only allowed for specific exceptions that exist for patient benefit: 1. For a health emergency and 2. For a necessary product evaluation.</p> |

| Institution | Mount Sinai School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 3 Industry may not choose the recipient of support for educational events. |
| Curriculum- Score & Comments | 3 The curriculum shows clear evidence of covering conflict of interest and pharmaceutical industry influence in a substantial way. |
| Oversight- Score & Comments | 0 There is no general oversight mechanism. |
| Non-Compliance- Score & Comments | 0 There is no reference to sanctions. |

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| Institution | New York College of Osteopathic Medicine of the New York Institute of Technology |
| City | Old Westbury, Long Island, NY |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | New York College of Osteopathic Medicine of the New York Institute of Technology |
|------------------------------------|--|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | New York Medical College |
| City | Valhalla, NY |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 The College provided no information on whether it distributes samples, and its policies contain no portions that are applicable to samples. |

| Institution | New York Medical College |
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| Purchasing- Score & Comments | 3 This policy prevents individuals with an external financial interest in a organization from taking part in transactions involving that organization. |
| Sales Reps- Score & Comments | 1 The provided policies contain no restrictions on industry representative site access. |
| On Campus- Score & Comments | 1 The College provided no policies that apply to on-site educational activities. |
| Off Campus- Score & Comments | 1 The College provided no policies that apply to off-site educational activities. |
| Industry Support- Score & Comments | 1 The College provided no policies that apply to scholarship or trainee funds. |
| Curriculum- Score & Comments | 1 The College provided no curriculum or statement on its curriculum. |
| Oversight- Score & Comments | 1 This policy provides for a committee to be appointed to serve as a reviewing body in the event of policy violations. |
| Non-Compliance- Score & Comments | 0 This policy does not outline any specific sanctions for violations of the policy beyond indicating an identified conflict will be prohibited or modified. |

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| Institution | New York University School of Medicine |
| City | New York, NY |
| Overall Grade | B |
| Overall Comments | With the highest scores in the domains of gifts, travel to off-site events, trainee and scholarship funds, P&T committees and curriculum, New York University School of Medicine has several strong policy areas. However, the domains of consulting and speaking relationships, pharmaceutical samples and industry representatives were not addressed in this policy. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from an I to a B. This institution has not consented to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 All gifts and on-site meals at this institution are banned. |
| Consulting- Score & Comments | 2 All consulting relationships must be annually disclosed and reviewed by the offices of compliance for conflicts of interest. |
| Speaking- Score & Comments | 1 No applicable policy was provided. |
| Disclosure- Score & Comments | 2 All faculty members are required to make annual, internal disclosures of any financial interests. "Trustees and Members of Management" must report biennially. |
| Samples- Score & Comments | 1 Although a samples policy was included in this submission, it only applied to trainees and house staff, and so was not applicable for this domain. |

| Institution | New York University School of Medicine |
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| Purchasing- Score & Comments | 3 "No Responsible Person (defined herein) shall participate in the selection, award or administration of a Contract with any party or entity in which he/she has a Material Interest." |
| Sales Reps- Score & Comments | 2 Industry sales representatives must pre-register, and may come on site by appointment only. |
| On Campus- Score & Comments | 2 The school adheres to ACCME standards for all CME activities. |
| Off Campus- Score & Comments | 3 All industry travel support must "be approved by the Vice President/Dean/Vice Dean designee" and acceptance of payment for attendance is not permitted. |
| Industry Support- Score & Comments | 3 All industry travel support must "be approved by the Vice President/Dean/Vice Dean designee" and acceptance of payment for attendance is not permitted. |
| Curriculum- Score & Comments | 3 In a clearly delineated curriculum policy, this school plans to provide medical students with a strong understanding of the relationships between physicians and industry. |
| Oversight- Score & Comments | 1 Oversight is clearly delineated. |
| Non-Compliance- Score & Comments | 1 This policy references sanctions. |

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| Institution | Northeastern Ohio University College of Medicine |
| City | Rootstown, OH |
| Overall Grade | C* |
| Overall Comments | Northeastern Ohio University College of Medicine has submitted a set of descriptions of its policies. The policy descriptions contain excellent language on gifts, P&T committees, scholarships and trainee funds and curriculum. However, the omission of disclosure of relationships, consulting relationships, and oversight and sanctions for noncompliance were weaknesses. This institution made a submission for the first time to the AMSA PharmFree Scorecard in 2009. In the absence of actual policy language, these descriptions will be graded as guidelines and will receive a maximum score of C*. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 Gifts of any type, including on-site meals, are prohibited |
| Consulting- Score & Comments | 1 No applicable policy was included. |
| Speaking- Score & Comments | 2 This institution "strongly discourages" faculty participation in speaker's bureaus, with the additional requirement that payment be at fair market value. |
| Disclosure- Score & Comments | 1 No applicable policy was included. |
| Samples- Score & Comments | 2 Although samples are required to be "centrally managed in a manner that ensures timely patient access," there is no other significant limitation on the use of samples as a marketing tool. |

| Institution | Northeastern Ohio University College of Medicine |
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| Purchasing- Score & Comments | 3 "Personnel with any financial interest in any particular manufacturer of pharmaceuticals, devices or equipment or any provider of services" are required "to disclose such interests accordingly and to recuse themselves from involvement in purchasing decisions relevant to the conflicting interests." |
| Sales Reps- Score & Comments | 2 Industry sales representatives are permitted on-site, but only by invitation or prior appointment and only in non-patient care areas. |
| On Campus- Score & Comments | 2 This institution adheres to ACCME standards for CME activities, as well as also requiring that "all requests for industry support and receipt of funds for CME activity are coordinated and overseen." |
| Off Campus- Score & Comments | 2 All personnel are prohibited from directly accepting travel funds and are strongly discouraged from accepting payment for attendance at off-site CME events. |
| Industry Support- Score & Comments | 3 All recipients of industry-funded scholarships and trainee funds will be chosen by the institution, with no quid pro quo involved in any way. |
| Curriculum- Score & Comments | 3 The policy mandates that curriculum will be developed around conflicts of interest between industry and physicians. |
| Oversight- Score & Comments | 0 No mechanism for oversight was mentioned. |
| Non-Compliance- Score & Comments | 0 No sanctions for noncompliance were noted. |

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| Institution | Northwestern University Feinberg School of Medicine |
| City | Chicago, IL |
| Overall Grade | C |
| Overall Comments | An exemplary disclosure policy mandates that all faculty disclose all financial relationships on an annual and per-transaction basis. There is no minimum reporting threshold, and all disclosures are posted on a public website. Additionally, there is a total ban on gifts and meals. However, this institution's other policies are not as strong. There are no policies regulating the use of pharmaceutical samples, purchasing and formularies, or inclusion of conflict of interest in the medical school curriculum. Northwestern University Feinberg School of Medicine submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade changes from In Process to a C. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 Accepting gifts of any type or value is prohibited. Industry-supplied meals are not permitted. |
| Consulting- Score & Comments | 1 While the institution "reserves the right" to require consulting agreements, they do not consistently require that faculty members provide copies of written consulting agreements to the Dean's Office. |
| Speaking- Score & Comments | 2 Compensation for speaking must be at fair market value, and all activity must be reported to the school within one year. Participation in speaker's bureaus is "strongly discouraged" - but not banned. |
| Disclosure- Score & Comments | 3 An exemplary disclosure policy. All faculty must disclose all income from the pharmaceutical industry, both on an annual and per-transaction basis. There is no de minimus threshold for disclosure, and all disclosures are posted on a public website and updated regularly. |
| Samples- Score & Comments | 1 No policy or policy not provided. |

| Institution | Northwestern University Feinberg School of Medicine |
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| Purchasing- Score & Comments | 1 No policy or policy not provided. |
| Sales Reps- Score & Comments | 2 Access by pharmaceutical representatives to individual faculty should be restricted to non-patient areas and non-public areas and should occur only by appointment or invitation of the physician. |
| On Campus- Score & Comments | 2 All requests for industry support and receipt of funds for CME activity should be coordinated and overseen by the CME office. Compliance with ACCME standards also cited. |
| Off Campus- Score & Comments | 3 Faculty, students, and trainees may not directly accept travel funds or reimbursement of expenses from industry other than for legitimate contractual services. |
| Industry Support- Score & Comments | 3 The Dean for Regulatory Affairs is responsible for selecting the recipient(s) of scholarships or funds with no involvement by the donor industry. |
| Curriculum- Score & Comments | 1 No curricular materials were submitted |
| Oversight- Score & Comments | 0 It is not clear that there is a party responsible for general oversight. |
| Non-Compliance- Score & Comments | 0 It is not clear that there are sanctions for noncompliance. |

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| Institution | Nova Southeastern University College of Osteopathic Medicine |
| City | Ft. Lauderdale, FL |
| Overall Grade | D |
| Overall Comments | Nova Southeastern University College of Osteopathic Medicine has a workable gifts policy and thorough oversight and compliance framework, but fails to address most other domains, including site access, consulting/speaking relationships, on- and off-site education, and disclosure of financial relationships. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from an F to a D. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 Gifts valued above \$50 must be reported to the compliance officer. |
| Consulting- Score & Comments | 1 A faculty member, at her discretion, may report consulting arrangements to department head or officer, but no required approval or other oversight mechanisms in place. |
| Speaking- Score & Comments | 1 No policy provided. |
| Disclosure- Score & Comments | 1 Disclosure of potential COIs is required, but no periodicity is specified. |
| Samples- Score & Comments | 1 No policy provided |

| Institution | Nova Southeastern University College of Osteopathic Medicine |
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| Purchasing- Score & Comments | 2 Faculty may not have: "interaction with suppliers with whom they have financial interests." |
| Sales Reps- Score & Comments | 1 No policy provided. |
| On Campus- Score & Comments | 1 No policy provided. |
| Off Campus- Score & Comments | 1 No policy provided. |
| Industry Support- Score & Comments | 1 No policy provided. |
| Curriculum- Score & Comments | 1 No policy provided. |
| Oversight- Score & Comments | 1 This institution provides an extensive description of the oversight duties assigned to the Compliance Officer and Corporate Integrity Committee. |
| Non-Compliance- Score & Comments | 1 This institution provides explicit material on instances of violation/irregularities in compliance with COI policy. |

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| Institution | Ohio State University College of Medicine |
| City | Columbus, OH |
| Overall Grade | B |
| Overall Comments | Ohio State University College of Medicine submitted a new vendor relationship policy for review that went into effect July 1, 2009. This strong policy puts clear limits on external relationships with industry that are not for commensurate services or serve a uniquely marketing purpose. The use of samples is restricted to specific exceptions, and prescribing of generics is encouraged. For higher marks in the area of on-site educational events, this institution could ensure that any educational content presented on-site be subject to review by the institution to ensure absence of bias. In 2008 this institution submitted a set of policies that were provisionally assessed while the institution completed its new policy development. Their grade improves from a D to a B. This institution has not consented to allow portions of their policy be cited for illustrative purposes. This institution's evaluation was last updated: 8/17/2009 |
| Gifts- Score & Comments | 2 Gifts, regardless of type or value, may not be accepted by covered persons. However, industry may give cash or educational gifts to medical center units. Meals provided directly to staff by industry are also prohibited, but industry may provide modest meals in the context of CME that they sponsor. |
| Consulting- Score & Comments | 2 Consulting arrangements with industry must be described in a written agreement, and payment must be commensurate to the task, and fair market value. There are no provisions for mandatory institutional review of consulting agreements. |
| Speaking- Score & Comments | 3 Commendably, this policy prohibits faculty from being kept on a retainer by industry for participation in a speakers' bureau. Further, faculty may never accept participate in or present at a speakers' bureau event where the goal of the activity is marketing a product. Presentation materials must be prepared solely by the medical center staff member. |
| Disclosure- Score & Comments | 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- Score & Comments | 3 The distribution of samples is prohibited, except when a clinical unit applies for an exception for a specific medication or patient population. Vendors may provide vouchers to clinical units, and prescribers are encouraged to prescribe generic medications to patients not able to easily afford medication. |

| Institution | Ohio State University College of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 2 Staff participating in purchasing decisions must disclose all potential financial conflicts for review, but are not automatically required to recuse themselves from the process. |
| Sales Reps- Score & Comments | 2 Sales representatives are restricted to appointment only visits and have limited access to patient care areas and patients. |
| On Campus- Score & Comments | 2 Industry is permitted to provide direct funding to medical center units to support educational events on-site. The policy did not describe any institutional approval of presentation content or expressly limit industry control of that content. |
| Off Campus- Score & Comments | 3 Medical center staff may not accept meals at off-sit events or payment for attendance. Travel support may only be accepted when the recipients are chosen by the department. |
| Industry Support- Score & Comments | 3 The institution must choose the recipient of any scholarship funding from industry. |
| Curriculum- Score & Comments | 3 The institution provided course material addressing the potential influence of industry relationships on medical decision-making. |
| Oversight- Score & Comments | 1 Oversight is established |
| Non-Compliance- Score & Comments | 1 Sanctions are referenced |

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|------------------------------|---|
| Institution | Ohlo University – College of Osteopathic Medicine |
| City | Athens, OH |
| Overall Grade | I |
| Overall Comments | In 2009 this institution submitted draft policies, or demonstrated an ongoing policy development process, allowing their In Process designation to be extended beyond one year. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Ohio University – College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Oklahoma State University Center for Health Sciences – College of Osteopathic Medicine |
| City | Tulsa, OK |
| Overall Grade | I |
| Overall Comments | In 2009, this institution informed us for the first time that they are revising or developing new policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Oklahoma State University Center for Health Sciences – College of Osteopathic Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|--|
| Institution | Oregon Health & Science University School of Medicine |
| City | Portland, OR |
| Overall Grade | B |
| Overall Comments | This institution has exemplary gifts and samples policies, as well as a strong annual disclosure policy that includes disclosure to patients in some cases. Prior review is also required for consulting relationships. While industry may not select the recipients of scholarships, there are weaker firewalls in place for industry support of on- and off-site education. This institution submitted revised policies for review in August of 2009. A subsequent reassessment improved their domain scores for gifts and meals, disclosure, and industry support for scholarships. This institution's evaluation was last updated: 12/4/2009 |
| Gifts- Score & Comments | 3 Gifts (including food) to employees are generally prohibited. No employees in positions of authority (including all prescribers) may accept any gifts, and no employee, regardless of authority, may accept branded gifts. Exceptions include reimbursement for provided services such as presentations. |
| Consulting- Score & Comments | 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- Score & Comments | 1 Speaking relationships are exempted from prior institutional approval. |
| Disclosure- Score & Comments | 3 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. This institution also requires review of financial relationships that may impact patient care. Commendably, review may require conflict management including disclosure to patients, corroboration of prescribing decision by a colleague, or transfer of patient care to another colleague. |
| Samples- Score & Comments | 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." |

| Institution | Oregon Health & Science University School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 2 Employees participating in purchasing decisions must disclose their significant financial interests annually; the purchasing committee or appropriate official will determine how conflicts should be managed. Recusal from decision-making is a management option, but is not necessarily required. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 According to policy no 10-01-030, industry support for educational events may be accepted if the event is ACCME-compliant. It is not clear that educational grants may not be earmarked by industry for a specific department. |
| Off Campus- Score & Comments | 1 Policy 10-01-030 stipulates that personnel providing substantive contributions to an off-site event may only do so if attendees are not compensated solely for attendance. However it is not clear that OHSU personnel are prevented from accepting compensation for attendance at events where an OHSU member is not providing substantive contributions. Further, policy 10-01-025 restricts the ability of personnel in positions of authority to accept payments for attendance at lectures, but it is not clear students are constrained in their ability to accept such payments. |
| Industry Support- Score & Comments | 3 Policy 10-01-030 stipulates that industry scholarships may be accepted only if the institution selects the individual recipient(s) |
| Curriculum- Score & Comments | 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- Score & Comments | 1 Integrity office responsible for implementation and compliance. |
| Non-Compliance- Score & Comments | 1 Sanctions: "may result in loss of privileges, disciplinary actions, termination of relationship " with the institution. |

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|------------------------------|---|
| Institution | Pennsylvania State University College of Medicine |
| City | Hershey, PA |
| Overall Grade | B |
| Overall Comments | With exemplary policies regarding gifts, consulting relationships, P&T committees and travel to off-site events, Pennsylvania State University College of Medicine has a solid overall conflict-of-interest policy. The only domain not addressed in a meaningful way was disclosure. This institution made a submission to the AMSA PharmFree Scorecard for the first time in 2009, and have also shared strong curricular materials. Their grade improves from an I to a B. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 All on-site gifts and meals are banned, while acceptance of industry gifts off-site is strongly discouraged. |
| Consulting- Score & Comments | 3 Consulting relationships must be submitted to department heads and must be paid at fair market value. |
| Speaking- Score & Comments | 2 Although speaker's bureaus are discouraged, they are not prohibited. However, payments must not exceed fair market value. |
| Disclosure- Score & Comments | 1 Annual internal disclosure is only required of faculty conducting research who have financial relationships exceeding \$10,000 per year. This disclosure policy excludes non-researcher faculty, and excludes faculty receiving payments under \$10,000. These payments may still represent conflicts able to affect patient care and student education, such as speaking engagements paid by industry in support of brand-name medication. |
| Samples- Score & Comments | 2 Drug samples are discouraged, and must be centrally managed. Also, generic medications should be stocked when feasible. |

| Institution | Pennsylvania State University College of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 3 A member of the P&T Committee must disclose any conflicts of interest to the rest of the committee, who will then decide whether to ban the individual from serving on the entire committee or just for the applicable decision. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are allowed on site by invitation/appointment only, in non-patient care areas. |
| On Campus- Score & Comments | 2 Support for educational activities must comply with ACCME standards, whether or not CME credit is awarded. |
| Off Campus- Score & Comments | 3 Accepting payment to attend an off-site education event is not permitted, and all educational travel funds recipients must be chosen by the institution, with no quid pro quo. |
| Industry Support- Score & Comments | 2 Scholarships and trainee funds are permissible as long as the support is provided to the institution, not the individual recipient. The policy doesn't specify whether industry is permitted to select the recipient. |
| Curriculum- Score & Comments | 3 This institution's curriculum promotes an understanding of industry marketing and its impact on prescribing. |
| Oversight- Score & Comments | 1 The institutional Conflict of Interest Committee is responsible for oversight. |
| Non-Compliance- Score & Comments | 1 Possible sanctions for noncompliance are outlined. |

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|------------------------------|---|
| Institution | Philadelphia College of Osteopathic Medicine |
| City | Philadelphia, PA |
| Overall Grade | F |
| Overall Comments | This institution declined to participate in AMSA PharmFree Scorecard 2008 and did not respond to requests for information for the 2009 Scorecard. The Georgia campus is covered by PCOM policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Philadelphia College of Osteopathic Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Pikeville College - School of Osteopathic Medicine |
| City | Pikeville, KY |
| Overall Grade | F |
| Overall Comments | This institution responded to the request for policies by noting it had no policies for any of the assessed domains. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Pikeville College - School of Osteopathic Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|--|
| Institution | Ponce School of Medicine |
| City | Ponce, PR |
| Overall Grade | B |
| Overall Comments | <p>Ponce School of Medicine has generally strong policies that touch on most of the domains scored. A ban on industry gifts is commendable, and the policy regarding scholarships and trainee funds does not allow industry control. However, many policies do not go a long way towards meaningfully regulating interactions between medical staff and the pharmaceutical industry. Consulting relationships are not reviewed or subject to restrictions, there are no general disclosure requirements for all staff, and there is no direct prohibition on the acceptance of payment to attend industry-sponsored meetings off-site. Ponce School of Medicine has submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade improves from an F to a B. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>2</p> <p>All gifts to individuals from industry are banned. However, there is no mention of on-site meals provided by industry in the policies.</p> |
| Consulting- Score & Comments | <p>1</p> <p>No policies regarding consulting relationships were included.</p> |
| Speaking- Score & Comments | <p>2</p> <p>Ponce School of Medicine strongly discourages, but does not prohibit participation in speaker's bureaus. The institution does require full transparency and disclosure of its personnel when participating in industry-sponsored, FDA-regulated programs.</p> |
| Disclosure- Score & Comments | <p>1</p> <p>Although Ponce provided a detailed policy regarding research disclosure, there is no policy requiring disclosure by all personnel.</p> |
| Samples- Score & Comments | <p>2</p> <p>Samples are required to be "centrally managed" throughout the institution, but there are no other restrictions on samples that would help prevent their use as a marketing tool.</p> |

| Institution | Ponce School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 3 Any personnel that have a financial interest in any particular manufacturer of pharmaceuticals, devices or equipment are required to recuse themselves from involvement in purchasing decisions relevant to the conflicting interests. |
| Sales Reps- Score & Comments | 2 Industry representatives must have an appointment to enter Ponce's medical facilities and are only permitted in non-patient care areas. |
| On Campus- Score & Comments | 2 All funds for CME activity are coordinated and overseen through the central CME office. All CME activities will be held according to ACCME standards. |
| Off Campus- Score & Comments | 2 This policy prohibits Ponce School of Medicine personnel from accepting funds to defray travel expenses solely for attendance at conferences. This policy also discourages payment for attendance, but does not prohibit it. |
| Industry Support- Score & Comments | 3 All funds for scholarships must be given to the central CME Program. No quid pro quo is allowed and the recipient of the funds will be chosen by the Deanship. |
| Curriculum- Score & Comments | 1 No curricular materials were provided. |
| Oversight- Score & Comments | 0 No mention of oversight was given. |
| Non-Compliance- Score & Comments | 0 There were no mentions of sanctions for noncompliance. |

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| Institution | Rocky Vista University College of Osteopathic Medicine |
| City | Parker, CO |
| Overall Grade | F |
| Overall Comments | Rocky Vista University College of Osteopathic Medicine declined to participate in the AMSA PharmFree Scorecard for 2008 and 2009. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Rocky Vista University College of Osteopathic Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Rush Medical College |
| City | Chicago, IL |
| Overall Grade | B |
| Overall Comments | Rush Medical College takes a strong stance against gifts from the industry and pharmaceutical samples by banning both. The school also has an exemplary disclosure policy, which requires both annual disclosure as well as disclosure to patients in cases where a conflict of interest exists. Most other domain scores were average. Rush Medical College has submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. These policies are final, although they will not be fully implemented until July of 2009. Their score improves from In Process to a B. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 All gifts and on-site meals are prohibited. |
| Consulting- Score & Comments | 3 Consulting relationships must be approved annually, and compensation must be commensurate with time and effort to services rendered. |
| Speaking- Score & Comments | 2 Faculty are prohibited from participating in speaker's bureaus, but there are no other limitations on speaking engagements. |
| Disclosure- Score & Comments | 3 Annual disclosure is required for all employees who receive outside compensation. Patients must be informed whenever a faculty member is using a device or drug manufactured by a company with which that faculty member has a financial relationship. |
| Samples- Score & Comments | 2 The use of product samples is prohibited in the hospital. Samples may be used in hospital-owned clinics only when specifically approved by the Chief Medical Officer. |

| Institution | Rush Medical College |
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| Purchasing- Score & Comments | 2 Individuals participating in product selection must disclose paid consulting relationships before participating in the decision. |
| Sales Reps- Score & Comments | 2 Vendor representatives may meet with faculty only by appointment. |
| On Campus- Score & Comments | 2 Adherence to ACCME standards is used to regulate all on-site educational activities. |
| Off Campus- Score & Comments | 3 Industry is prohibited from selecting the recipients of travel support, and all industry funding arrangements must be approved by the Departmental Chairperson. |
| Industry Support- Score & Comments | 3 Trainees who receive funding from industry must be selected by the institution, and the funds must be provided to the department and not directly to the trainee. |
| Curriculum- Score & Comments | 1 No policy or policy not provided. |
| Oversight- Score & Comments | 0 A specific person or group responsible for oversight is not clearly established. |
| Non-Compliance- Score & Comments | 0 Sanctions are established. |

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|------------------------------|---|
| Institution | Saint Louis University School of Medicine |
| City | St. Louis, MO |
| Overall Grade | I |
| Overall Comments | <p>This institution has informed us that they are revising or developing their policies. However they have provided material for review. A task force at Saint Louis University School of Medicine has made a list of recommendations for an institutional conflict of interest policy. SLU's policy recommendations are strongest in the areas of gifts and P however, there are no policies in the areas of consulting, speaking, and disclosure. Additionally, no oversight or sanctions are established. This institution made a submission for the first time to the AMSA PharmFree Scorecard in 2009. Their status is In Process. Their provisional grade is a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>All gifts to individuals and on-site meals are banned.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>No policy or policy not provided.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>No policy or policy not provided.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>No policy or policy not provided.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>Samples for patients must be distributed either through a voucher system or under the oversight of the pharmacist. However, doctors are not prevented from receiving vouchers from industry for distribution to patients. This allows brand bias in samples and the influence of "gifting" to continue.</p> |

| Institution | Saint Louis University School of Medicine |
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| Purchasing- Score & Comments | 3 Committee members must recuse themselves from any decision related to any company with which they may have a financial or educational conflict of interest. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are permitted to meet with faculty and staff by appointment only. |
| On Campus- Score & Comments | 2 Educational grants must be unrestricted and of legitimate educational merit. Funds may not go directly to faculty or students, and all grants must be reported to the institution. |
| Off Campus- Score & Comments | 2 Attendees at off-site events are prohibited from accepting travel funds, unless the arrangement is approved in advance. However, payments for attendance (separate from travel support) are not addressed. |
| Industry Support- Score & Comments | 3 Educational funds must be unrestricted and may not go directly to the recipient. |
| Curriculum- Score & Comments | 2 The policy recommendations cite that trainees should be trained on physician-industry interactions, but do not provide enough detail for further evaluation. |
| Oversight- Score & Comments | 0 Oversight is not established. |
| Non-Compliance- Score & Comments | 0 Sanctions are not established. |

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| Institution | San Juan Bautista School Of Medicine |
| City | Caguas, PR |
| Overall Grade | F |
| Overall Comments | Unfortunately, San Juan Bautista School Of Medicine has provided a policy that does not address any of the scorecard domains in a meaningful way. San Juan Bautista School Of Medicine submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade remains an F. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 No applicable policy was included. |
| Consulting- Score & Comments | 1 No applicable policy was included. |
| Speaking- Score & Comments | 1 No applicable policy was included. |
| Disclosure- Score & Comments | 1 No applicable policy was included. |
| Samples- Score & Comments | 1 No applicable policy was included. |

| Institution | San Juan Bautista School Of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 No applicable policy was included. |
| Sales Reps- Score & Comments | 1 No applicable policy was included. |
| On Campus- Score & Comments | 1 No applicable policy was included. |
| Off Campus- Score & Comments | 1 No applicable policy was included. |
| Industry Support- Score & Comments | 1 No applicable policy was included. |
| Curriculum- Score & Comments | 1 No applicable policy was included. |
| Oversight- Score & Comments | 0 No applicable policy was included. |
| Non-Compliance- Score & Comments | 0 No applicable policy was included. |

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| Institution | Southern Illinois University School of Medicine |
| City | Springfield, IL |
| Overall Grade | C |
| Overall Comments | <p>On the whole, this institution has comprehensive policies addressing all of the graded areas in the Scorecard. Highlights include the Ethics Hotline available for reporting, a detailed list of ways of carefully resolving conflicts of interest and an Industry Representative evaluation form for physicians to fill out after meetings. If the institution strengthens its policies concerning gifts and payment from industry, its policies will be very impressive. Southern Illinois University School of Medicine submitted revised policies for the 2009 AMSA PharmFree Scorecard. Their grade improves from a D to a C. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>2</p> <p>Onsite meals from industry representatives are not allowed, and meals at any other location are strongly discouraged. Employees are also not permitted to accept gifts of more than nominal value from industry reps.</p> |
| Consulting- Score & Comments | <p>3</p> <p>This policy, which encapsulates all non-university activity for which the faculty member receives at least \$1000/year, requires prior approval at the Departmental level and that payment must be made at "fair market value".</p> |
| Speaking- Score & Comments | <p>2</p> <p>The institution "strongly discourages participation in industry-sponsored speakers' bureaus" instead of outright prohibiting participation. However, the policy continues by requiring fair market value compensation for services, preventing industry from manipulating any content of the presentation and requiring full disclosure by faculty at these programs.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>In this policy, annual internal disclosure for the rest of the member's tenure is required as soon as a faculty member receives \$1000 or more in one fiscal year. Requiring all faculty to report annually regardless of financial relationships would remove the burden of compliance from faculty and make this policy more robust.</p> |
| Samples- Score & Comments | <p>1</p> <p>Pharmaceutical samples are 'in general' discouraged and they may only be issued at the request of medical faculty, but the lack of any stronger language results in a 1 for this domain.</p> |

| Institution | Southern Illinois University School of Medicine |
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| Purchasing- Score & Comments | 2 Although this institution's strongly worded principles say faculty should not participate in the negotiation of equipment purchases between the University and an organization "in which the individual has a significant economic interest", the wording of 'significant economic interest' is ambiguous. It is also unclear if the principles are meant to be strictly followed or are meant more as guidelines. |
| Sales Reps- Score & Comments | 2 Industry representatives may only meet with faculty by appointment or by invitation, and then may only meet in non-patient care areas. |
| On Campus- Score & Comments | 2 This institution complies with ACCME standards. It does not further attempt to address bias in industry funded continuing education. |
| Off Campus- Score & Comments | 3 Although the institution allows industry to sponsor travel scholarships for students to attend conferences, industry is not permitted to select the recipients or administer the awards. Also, faculty are not permitted to receive payment from industry for attending conferences. |
| Industry Support- Score & Comments | 3 Model language: "All scholarships or other educational funds from industry should be processed centrally through the administration for the School of Medicine; No quid pro quo may be involved in any way; and The evaluation and selection of individual recipients of such funds should be the sole responsibility of the School of Medicine." |
| Curriculum- Score & Comments | 3 With several provided examples of curriculum addressing the relationship between doctors and the pharmaceutical industry, students at this institution will clearly leave with a good understanding of how to navigate that relationship themselves. |
| Oversight- Score & Comments | 1 Oversight is clearly documented. |
| Non-Compliance- Score & Comments | 1 It is clear that there will be sanctions for noncompliance with this school's policies. |

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| Institution | Stanford University School of Medicine |
| City | Stanford, CA |
| Overall Grade | A |
| Overall Comments | Stanford University School of Medicine's conflict of interest policy is exemplary in many areas. Of important note is Stanford's gold-standard policy on industry support of CME, and public disclosures by faculty. In addition, there is a total ban on gifts and on-site meals, thorough restrictions on speaking relationships, and an unusually strong disclosure policy, requiring posting of all financial relationships on a website accessible to the public. This institution requested a reassessment of their 2009 submission, and identified policy provisions that the AMSA Scorecard had not captured. Their grade was updated from a B to an A. This institution's evaluation was last updated: 12/15/2009 |
| Gifts- Score & Comments | 3 Gifts may not be accepted by any faculty or staff member on campus. On-site industry sponsored meals are also prohibited. |
| Consulting- Score & Comments | 2 Institutional review of all consulting relationships is required by Stanford University School of Medicine. The policies provided did not include a requirement that consulting contracts be fair or compensation commensurate to the task. |
| Speaking- Score & Comments | 3 Participation in "speaker's bureaus" is not permitted. Additionally, the faculty member must choose and prepare the lecture content without influence of the industry. |
| Disclosure- Score & Comments | 3 "All faculty must disclose all personal financial relationships on an annual basis for posting in the School's publicly accessible Community Academic Profiles (CAP) system." |
| Samples- Score & Comments | 3 This institution has a strong samples policy, which prevents samples from going directly to doctors (they are controlled and dispensed by the pharmacy) and allows them only where specially approved by Stanford Hospitals and Clinics. Where approved they are limited to only 10 different |

| Institution | Stanford University School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 2 Sales and marketing representatives are not permitted in patient-care areas except by appointment to provide in-service training. Sales and marketing representatives are permitted in non-patient care areas by appointment only, normally only for evaluation of new purchases of equipment and devices, or in-service training. Pharmaceutical sales representatives are not explicitly prohibited from the site, although the effect of this policy may be to significantly limit their presence. |
| On Campus- Score & Comments | 3 This institution has banned direct funding of CME by industry, and allows funding designation only by general areas of interest. By removing the potential for funding bias in therapeutic areas related to frequently promoted products, this institution's policy is exemplary. |
| Off Campus- Score & Comments | 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)." |
| Industry Support- Score & Comments | 3 The recipients of scholarships and trainee funds are to be selected by the institution. |
| Curriculum- Score & Comments | 3 This institution has a curricular component focused on financial conflicts of interest and their management. This policy could be strengthened by demonstrating greater focus on conflicts of interest issues outside of the research framework. |
| Oversight- Score & Comments | 1 Oversight established |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | State University of New York Health Science Center at Brooklyn - SUNY Downstate |
| City | New York, NY |
| Overall Grade | I |
| Overall Comments | In 2009, this institution informed us for the first time that they are revising or developing new policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | State University of New York Health Science Center at Brooklyn - SUNY Downstate |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | Stony Brook University School of Medicine |
| City | Stony Brook, NY |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 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- Score & Comments | 1 No policy, or policy not provided. |
| Speaking- Score & Comments | 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- Score & Comments | 1 Annual disclosure is only required for researchers; there is no mention of university- or staff-wide disclosure. |
| Samples- Score & Comments | 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. |

| Institution | Stony Brook University School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 No policy, or policy not provided. |
| Sales Reps- Score & Comments | 1 A site access policy is alluded to but not provided. |
| On Campus- Score & Comments | 2 Educational programs are governed by ACCME standards for commercial support. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 0 No oversight mechanism referenced. |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced. |

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|---|--|
| Institution | SUNY Upstate Medical University |
| City | Syracuse, NY |
| Overall Grade | B |
| Overall Comments | 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 and other policy revisions currently in development. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 1 Annual disclosure is required only of consulting relationships maintained by researchers/investigators. There is no institutional oversight of consulting relationships generally. |
| Speaking- Score & Comments | 1 No policy, or policy not provided. |
| Disclosure- Score & Comments | 1 No general disclosure; Only research applicants must annually file COI disclosure. Otherwise, disclosure is mandated only for P&T members and publications. |
| Samples- Score & Comments | 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. |

| Institution | SUNY Upstate Medical University |
|------------------------------------|---|
| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 2 Drug detailers are allowed on campus only by invitation and only in non-patient care areas. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 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- Score & Comments | 0 Only pharmaceutical vendors are subject to oversight and sanctions. |
| Non-Compliance- Score & Comments | 0 Only pharmaceutical vendors are subject to oversight and sanctions. |

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|---|---|
| Institution | Temple University School of Medicine |
| City | Philadelphia, PA |
| Overall Grade | I |
| Overall Comments | <p>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. This institution's evaluation was last updated: 6/3/2008 Update 5/25/2010 Temple University Medical School promulgated revised COI policies in July 2009 but submitted these to the Scorecard for reassessment on February 15th, 2010, after the 2009 assessment period had ended. New policies will be assessed for the 2010 Scorecard, until which time Temple's grade has been changed from a "D" to "In Process".</p> |
| Gifts- Score & Comments | <p style="text-align: center;">1</p> <p>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.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>Consulting contracts must be fair-market pay for legitimate services.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>No disclosure policy provided.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>The samples policy does not meaningfully limit the use of samples as a marketing tool.</p> |

| Institution | Temple University School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 The institution does not make purchasing decisions. |
| Sales Reps- Score & Comments | 1 No applicable policy provided. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 3 The institution prohibits the receipt of travel support or payment for attendance at off-site events |
| Industry Support- Score & Comments | 1 Policy not provided. |
| Curriculum- Score & Comments | 2 This policy makes general reference to departmental responsibility for curricular content on gifts to physicians. |
| Oversight- Score & Comments | 0 No oversight referenced. |
| Non-Compliance- Score & Comments | 0 No sanctions referenced. |

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|---|---|
| Institution | Texas A&M Health Science Center College of Medicine |
| City | College Station, TX |
| Overall Grade | I |
| Overall Comments | <p>This institution has informed us that they are revising or developing their policies. However they have provided material for review. With this new, provisional policy, Texas A&M Health Science Center College of Medicine addresses all of the scorecard domains, with especially strong policies in formulary committees, travel to off-site CME events, scholarships funds and training for students. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their status is in process. Their provisional grade is a B. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>All gifts and meals from industry, on-site or off-site, are banned.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>This institution strongly discourages participation in speaker's bureaus. However, if faculty decide to participate, they are required to disclose all payments and events to the institution. Speaker's fees will be at fair market value and the payments will be made through the institution's central fund.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>Internal disclosure is only required for those participating in a speakers bureau.</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>The institution explicitly prohibits physicians from directly receiving samples from sales representatives and mandates that samples be managed centrally.</p> |

| Institution | Texas A&M Health Science Center College of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 3 All personnel with any direct financial interest in the companies involved are required to disclose the interest and recuse themselves from involvement with purchasing decisions related to the conflicting interests. |
| Sales Reps- Score & Comments | 2 Industry representatives are permitted site access only by invitation and appointment. |
| On Campus- Score & Comments | 2 This policy cites ACCME standards for managing industry educational support and also requires that all funds be coordinated and overseen by the institution, although the use of a central managed fund is not mandated. |
| Off Campus- Score & Comments | 3 The institution prohibits payment from industry for attendance at off-site events and mandates that travel reimbursement be restricted to legitimate reimbursement for contractual services. |
| Industry Support- Score & Comments | 3 All industry-sponsored scholarships and trainee funds must be unrestricted. Evaluation and selection of recipients of the funds will be the sole responsibility of the institution. |
| Curriculum- Score & Comments | 3 This policy addresses training of potential conflicts of interest with industry. |
| Oversight- Score & Comments | 1 The Dean of the College of Medicine is responsible for oversight. |
| Non-Compliance- Score & Comments | 1 Possible sanctions are outlined. |

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| Institution | Texas Tech University Health Sciences Center School of Medicine |
| City | Lubbock, TX |
| Overall Grade | B |
| Overall Comments | The conflict of interest policies submitted by Texas Tech University Health Sciences Center School of Medicine indicate that the institution understands the potential for industry-practitioner relationships to conflict with patient care and public trust. The institution has commendable policy on industry scholarships and purchasing and formulary committees, and fair policies for gifts and consulting relationships, but does not indicate who is responsible for enforcement or provide sanctions for violations of any of the policies. This represents the first substantive submission by Texas Tech University Health Sciences Center School of Medicine to the AMSA Scorecard This institution's evaluation was last updated: 8/24/2009 |
| Gifts- Score & Comments | 2 This institution has a strong policy that prohibits personal gifts and meals both on- and off-site, but that allows for the acceptance of textbooks and educational items on behalf of the institution that promote objective and scientific knowledge beneficial to teaching and/or patient care, if approved by the department chair. |
| Consulting- Score & Comments | 2 Consulting agreements must be set forth in writing and compensation must be fair market value for actual work performed. |
| Speaking- Score & Comments | 2 This policy bans the receipt of compensation for presenting at events where vendors have wholly or in part contributed to the content of the presentation. However, long-term speaking relationships such as speaker's bureaus are not explicitly limited in this policy. |
| Disclosure- Score & Comments | 1 This institution did not provide a policy requiring periodic disclosure of financial relationships with industry. |
| Samples- Score & Comments | 1 In general samples are permitted, but personal use by faculty and staff is prohibited. |

| Institution | Texas Tech University Health Sciences Center School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 No compensation or gift shall be sought or accepted from a Health Care Vendor by an individual who has or may have a substantive role in the selection of that Health Care Vendor to provide items or services under contract to the institution. |
| Sales Reps- Score & Comments | 2 This institution has implemented a vendor registration and screening system to monitor and regulate vendor sales representative actions on site. Sales representative access is limited to non-patient care areas and meetings must be scheduled in advance. |
| On Campus- Score & Comments | 2 This institution's on-site education policy outlines requirements for funding for accredited education to pass through continuing education offices, but there is not explicit oversight of program content. Approval of funding mechanisms for education programs not accredited through internal processes are at the discretion of School deans and continuing education department heads. |
| Off Campus- Score & Comments | 3 Support for travel or other defraying of costs of participation in conferences or other off-site educational events is prohibited. Exceptions are provided for fair market value payments for speaking and other meaningful participation at educational events when the agreement is set forth in writing. |
| Industry Support- Score & Comments | 3 Scholarships may be provided through the School, Department, Program or Division, provided the institution selects the recipient and the educational event does not focus solely on the awarding vendor's products. |
| Curriculum- Score & Comments | 1 No curricular policy or materials provided. |
| Oversight- Score & Comments | 0 Oversight not established |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced |

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| Institution | The Brody School of Medicine |
| City | Greenville, NC |
| Overall Grade | I |
| Overall Comments | <p>The Brody School of Medicine has previously submitted policies that touch on many of the domains on which it was assessed, but these policies are not likely to significantly reduce the impact of pharmaceutical industry marketing and influence. In its 2009 submission, this institution indicated that policy revisions are being considered by an institutional task force. As such, they receive an "In Process" grade this year. The policies they submitted previously are described below. These policies received a grade of "D" in the 2008 Scorecard. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">1</p> <p>This policy states that gifts must be primarily for patient benefit, or be of minimal value and relate to the recipient's work.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>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."</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>This policy states that honoraria for speaking engagements must be reasonable.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |

| Institution | The Brody School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 No policy, or policy not provided. |
| Sales Reps- Score & Comments | 2 Sales representatives must have an appointment to visit the School of Medicine. |
| On Campus- Score & Comments | 2 Lecture and conference organizers are responsible for all materials, content and methods. |
| Off Campus- Score & Comments | 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." |
| Industry Support- Score & Comments | 3 Sponsors of scholarships are permitted as long as the School of Medicine selects the recipient. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 0 No particular party is charged with overseeing student and faculty compliance with the policies. |
| Non-Compliance- Score & Comments | 1 Sanctions are referenced in this policy. |

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| Institution | Thomas Jefferson University - Jefferson Medical College |
| City | Philadelphia, PA |
| Overall Grade | B |
| Overall Comments | <p>This institution has developed a set of policies highlighted by strong firewalls for purchasing and formulary committee decisions and an unequivocal gift ban. Commendably, the institution also requires the disclosure of conflicts to patients. However a lenient samples policy, less stringent consulting and speaking restrictions and seemingly permissive rules regarding industry funding of off-site education are concerns. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 11/11/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>This AMC prohibits gifts regardless of nature, value, and location. Meals are only permitted in CE accredited events and properly approved and disclosed consulting relationships, but it is unclear that this is a meaningful restriction on industry-provided meals.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>Consulting relationships must be disclosed to the COI committee and others, depending on scope of payment, and payments must be commensurate to task and documented in a formal contract.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>Speakers' bureaus are defined and prohibited, but industry control is not explicitly banned if the speaking engagement is part of a CE-accredited event.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">3</p> <p>Annual disclosure of conflicts required of all personnel, as is disclosure of conflicts to patients when that relationship might represent an apparent or perceived conflict of interest.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>This institution has no meaningful restriction on samples.</p> |

| Institution | Thomas Jefferson University - Jefferson Medical College |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 Committee members must be excluded from the committee or participation in decisions related to a company with which they have a financial interest. |
| Sales Reps- Score & Comments | 2 Industry sales representatives may be in the academic medical center but only by appt. and may only detail in non patient-care areas. |
| On Campus- Score & Comments | 2 This policy requires centralization and pooling of funds at the institutional level for industry support of non CE-accredited activity. For CE-accredited activity, industry may provide support for specific programs, and while such support must be overseen centrally, it is not pooled. |
| Off Campus- Score & Comments | 2 Funding, gifts and stipends for off-site events are generally prohibited except in cases where a physician is conducting a CE presentation, or serves as a consultant or member of an advisory board, which may be too broad an exemption to impose meaningful restrictions on industry travel support. |
| Industry Support- Score & Comments | 3 Industry may not select scholarship recipients. |
| Curriculum- Score & Comments | 1 This school demonstrates it has thought about the components of a purposeful curriculum on industry relations, but it's unclear from the documents provided that the curriculum discusses industry marketing's effects on prescribing. |
| Oversight- Score & Comments | 1 Oversight established |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | Touro College of Osteopathic Medicine - New York |
| City | New York, NY |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Touro College of Osteopathic Medicine - New York |
|------------------------------------|--|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | Touro College of Osteopathic Medicine - Vallejo and Nevada |
| City | Vallejo, CA |
| Overall Grade | C |
| Overall Comments | At the Touro College of Osteopathic Medicine, Vallejo and Nevada campuses, the recipients of scholarships or trainee funds must be selected by the AMC, and travel support from industry for attending off-site educational events is not permitted. However, these policies are less strong with regards to gifts and sample use. Touro College of Osteopathic Medicine, Vallejo, submitted new policies to the 2009 AMSA PharmFree Scorecard. They indicated that these policies also cover the Touro College of Osteopathic Medicine, Nevada. Their grade remains a C. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 There are no significant restrictions on the ability of employees to accept gifts. It unfortunately appears that this institution's formerly strong gifts policy has been replaced by a very weak one. |
| Consulting- Score & Comments | 2 Reasonable compensation for consulting services is permitted |
| Speaking- Score & Comments | 2 Meeting or lecture content must be determined independently of industry influence. |
| Disclosure- Score & Comments | 1 No policy or policy not provided. |
| Samples- Score & Comments | 1 No policy or policy not provided. |

| Institution | Touro College of Osteopathic Medicine - Vallejo and Nevada |
|------------------------------------|--|
| Purchasing- Score & Comments | 2 Members of purchasing committees must disclose any relevant financial relationships before participating in relevant decisions; the purchasing unit will then decide if that individual will be permitted to participate in the decision. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are allowed in non-patient care areas by appointment only. |
| On Campus- Score & Comments | 2 On-site educational events must comply with ACCME standards. There are no additional policies related to on-site education that provide more stringent limitations on industry influence. |
| Off Campus- Score & Comments | 3 Employees may not accept compensation or travel subsidies for attending meetings or other educational events. |
| Industry Support- Score & Comments | 3 Industry support for scholarships and funds for trainees is acceptable in cases where the institution selects the recipient of the funds. |
| Curriculum- Score & Comments | 2 The policy specifies that all staff and trainees will be trained with regards to potential conflicts of interest with industry, but there is no further elaboration of topics to be covered in the curriculum. |
| Oversight- Score & Comments | 0 No oversight mechanism is referenced. |
| Non-Compliance- Score & Comments | 0 No sanctions for non-compliance are identified. |

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|------------------------------|---|
| Institution | Tufts University School of Medicine |
| City | Boston, MA |
| Overall Grade | D |
| Overall Comments | <p>Tufts University School of Medicine's policies address almost all assessed domains. A complete ban on gifts and on-site meals is particularly strong. However, many of this institution's policies could better regulate interactions between TUSM medical staff and the pharmaceutical industry. Implementing review of external relationships, a ban on participation in speakers' bureaus, provision of policies regulating industry-funded scholarships and provision of affiliated clinical policies would improve this institution's overall assessment. Tufts University School of Medicine submitted policies for the first time to the 2009 AMSA PharmFree Scorecard. Their grade moves from In Process to a D. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>On-site meals and personal gifts from industry are prohibited.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>Consulting relationships are required to have a "consulting contract that identifies specific tasks and deliverables and contains payment provisions that are consistent with the assigned tasks"</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>Although TUSM strongly discourages participation in speaker's bureaus, it does not prohibit it. The policy does not prevent long-term speaking relationships.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>All TUSM faculty and key educators are required to internally disclose their relationships with industry on an annual basis. TUSM also encourages all its affiliated institutions to do the same.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>This medical school's policy doesn't place restrictions on samples at its affiliated clinical sites. AMSA is happy to accept policies of affiliated clinics to give greater credit in this domain.</p> |

| Institution | Tufts University School of Medicine |
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| Purchasing- Score & Comments | 1 No policy was provided regarding purchasing and formulary committees. |
| Sales Reps- Score & Comments | 1 No significant policies restricting site access by vendor representatives were included. |
| On Campus- Score & Comments | 2 In addition to citing ACCME standards for CME events, Tufts School of Medicine requires that all industry support for CME events be handled by the Office of CME, who will then distribute the funds as necessary. |
| Off Campus- Score & Comments | 2 "Payment for attendance at industry-sponsored events is prohibited." However, industry support for travel to off-site events is not discussed. |
| Industry Support- Score & Comments | 1 There was no policy provided regarding scholarships or trainee funds. |
| Curriculum- Score & Comments | 1 Although it was noted that conflicts of interest are covered during several courses at Tufts, including Ethics and Professionalism, Epidemiology and Biostatistics, and Evidence Based Medicine, no curricular materials were provided. |
| Oversight- Score & Comments | 1 Compliance is monitored by the Office of the Vice Dean. |
| Non-Compliance- Score & Comments | 1 Sanctions for noncompliance are described in this policy. |

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| Institution | Tulane University School of Medicine |
| City | New Orleans, LA |
| Overall Grade | F |
| Overall Comments | This institution declined to participate in AMSA PharmFree Scorecard 2008 and did not respond to requests for information for the 2009 Scorecard. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Tulane University School of Medicine |
|------------------------------------|--------------------------------------|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | Uniformed Services University of the Health Sciences |
| City | Bethesda, MD |
| Overall Grade | B |
| Overall Comments | 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. Due to a clarification in the Scorecard methodology, this institution's domain score for site-access by industry sales representatives has changed from NA to a 1, resulting in an overall grade change from an A to a B. This institution's evaluation was last updated: 6/3/2008 with the revision described above updated 6/16/2009 |
| Gifts- Score & Comments | 2 This policy does allow gifting, but contains very strict controls. 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 Military teaching hospitals may have samples policies, but USU itself does not dispense prescription drugs. |

| Institution | Uniformed Services University of the Health Sciences |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 Recusal is required for individuals in decision-making bodies when they have financial relationships with the entity under consideration. |
| Sales Reps- Score & Comments | 1 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 Campus- Score & Comments | 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 Campus- Score & Comments | 3 Travel funds for off-site event attendance must be approved. Gifts for attendance are prohibited under gifts policy. |
| Industry Support- Score & Comments | 3 Oversight of scholarship funds in place. |
| Curriculum- Score & Comments | 1 It was unclear whether medical school curriculum covers explicitly pharmaceutical interactions with physicians and trainees. |
| Oversight- Score & Comments | 1 Significant oversight established in policies. |
| Non-Compliance- Score & Comments | 1 Well-delineated sanctions established in policies. |

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| Institution | Universidad Central del Caribe School of Medicine |
| City | Bayamon, PR |
| Overall Grade | F |
| Overall Comments | This institution has not responded to AMSA's request for policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | Universidad Central del Caribe School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|--|
| Institution | University at Buffalo School of Medicine |
| City | Buffalo, NY |
| Overall Grade | F |
| Overall Comments | <p>Although we are grateful that University at Buffalo School of Medicine submitted its medical school policy for review, the only domain that was addressed in this policy was on-site CME. We hope that Buffalo will be able to develop new conflict-of-interest policies for the future. This institution made a submission for the first time to the AMSA PharmFree Scorecard in 2009. Their grade remains an F. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="background-color: #D9E1F2;">1</p> <p>No applicable policy included.</p> |
| Consulting- Score & Comments | <p style="background-color: #D9E1F2;">1</p> <p>No applicable policy included.</p> |
| Speaking- Score & Comments | <p style="background-color: #D9E1F2;">1</p> <p>No applicable policy included.</p> |
| Disclosure- Score & Comments | <p style="background-color: #D9E1F2;">1</p> <p>No applicable policy included.</p> |
| Samples- Score & Comments | <p style="background-color: #D9E1F2;">1</p> <p>No applicable policy included.</p> |

| Institution | University at Buffalo School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 No applicable policy included. |
| Sales Reps- Score & Comments | 1 No applicable policy included. |
| On Campus- Score & Comments | 2 This institution adheres to ACCME standards for all CME activities. |
| Off Campus- Score & Comments | 1 No applicable policy included. |
| Industry Support- Score & Comments | 1 No applicable policy included. |
| Curriculum- Score & Comments | 1 No applicable policy included. |
| Oversight- Score & Comments | 0 No applicable policy included. |
| Non-Compliance- Score & Comments | 0 No applicable policy included. |

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| Institution | University of Alabama Birmingham School of Medicine |
| City | Birmingham, AL |
| Overall Grade | C |
| Overall Comments | <p>University of Alabama at Birmingham School of Medicine assessment has a set of good policies that cover all of the assessed domains. Of particular note are excellent curricular requirements, as well as strong language requiring prior approval of all external consulting relationships, and all speaking relationships outside of one per year. Policy could be strengthened in the area of samples by requiring the pharmacy or other central location to accept all samples for patient use directly, rather than through staff. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from In Process to a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 8/13/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>Gifts and meals from industry are prohibited at this institution, with the exception of food in conjunction with accredited CME.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>Commendably, external consulting relationships must receive prior approval. However the provided policy does not state that these relationships must be described in a formal contract or that payment must be commensurate to the task.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>This institution requires prior approval for all speaking engagements exceeding one per year. Participation in speakers' bureaus is strongly discouraged, although it is not prohibited.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>Annual internal disclosure is required by all employees and trainees.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>Employees and trainees may not receive samples for personal use, but may receive them for patient use. This does not meaningfully address the marketing influence of samples.</p> |

| Institution | University of Alabama Birmingham School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 2 Members of purchasing and formulary committees must disclose their conflicts relevant to purchasing decisions. However recusal is not mandated in all cases. |
| Sales Reps- Score & Comments | 2 Industry sales representatives may come on-site by appointment only, and are restricted to non-patient care areas (except for the purpose of training on devices). |
| On Campus- Score & Comments | 2 All CME, whether or not accredited, must comply with ACCME standards. Further, funding may not go to the individual, but must be centralized at the departmental or divisional level. This policy could be strengthened by mandating centralization of funds at the institutional, rather than departmental level, and ensuring industry may not select recipient departments. |
| Off Campus- Score & Comments | 3 Employees and trainees may not accept compensation for merely attending industry-sponsored educational events, nor may they accept travel support. |
| Industry Support- Score & Comments | 3 The institution must manage all industry-provided scholarship funds. However it is not clear that industry may not earmark award recipients. |
| Curriculum- Score & Comments | 3 Exemplary policy, mandating all departments train students and staff on conflicts of interest and industry interactions, emphasizing data interpretation techniques and evidence-based medicine. Further, medical education must cover prescribing bias associated with industry representative interaction. |
| Oversight- Score & Comments | 1 An overall oversight body for policy compliance is not clearly stated |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | University of Arizona College of Medicine |
| City | Tuscon, AZ |
| Overall Grade | F |
| Overall Comments | This institution did not provide policies for assessment, or demonstrate ongoing policy development, after remaining In Process for one year. Their grade therefore reverts to an F. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of Arizona College of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | University of Arkansas for Medical Sciences |
| City | Little Rock, AR |
| Overall Grade | I |
| Overall Comments | <p>This institution requested a reassessment on June 26, 2009. Their policies will be reassessed within 60 days, until which time an in-process designation will remain in place. A strong ban on gifts is complemented by a strong policy mandating that members of purchasing/formulary committees recuse themselves from any decisions related to companies with which they may have a financial relationship. However, there are no significant restrictions in the areas of speaking, the use of pharmaceutical samples, scholarships and trainee funds. There is also no evidence that conflict of interest is covered in a meaningful way in the medical school curriculum. The University of Arkansas for Medical Sciences submitted revised policies to the 2009 AMSA PharmFree Scorecard. Their grade improves from a D to a C. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>"An employee shall not solicit or accept any gift or other item of monetary value from any person or entity doing business with or seeking to do business with [the institution]."</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>"Outside employment requires prior written approval by the department head or dean."</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>There is no evidence of any substantive limitations on speaking arrangements.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>"All contracts with or any financial interests in entities in the healthcare industry or entities that contract with (includes employment), are otherwise engaged in business with or seek to do business with [the institution] must be disclosed annually"</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>There are no significant limitations on the use of samples as a marketing tool</p> |

| Institution | University of Arkansas for Medical Sciences |
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| Purchasing- Score & Comments | 3 An employee may not "review, approve, or administratively control contracts" when that employee, or a member of their family, has any financial interest in the company involved. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are not permitted into the hospital or clinics without an appointment. |
| On Campus- Score & Comments | 2 The institution relies primarily on adherence to ACCME standards with regards to limiting industry influence on on-site educational activities. |
| Off Campus- Score & Comments | 2 Payment for attendance at events is not explicitly prohibited, but industry may only pay for travel and lodging for attendees at off-site educational events if such compensation has been approved by the Department Chair, Director, Dean, or Hospital CEO. |
| Industry Support- Score & Comments | 1 There are no significant limitations on industry's ability to support scholarships and funds for trainees. |
| Curriculum- Score & Comments | 1 There is no evidence that the medical school curriculum covers conflict of interest and the influence of pharmaceutical marketing practices in a meaningful way. |
| Oversight- Score & Comments | 1 The Conflict of Interest Committee is responsible for reviewing disclosures and managing potential conflicts of interest. |
| Non-Compliance- Score & Comments | 1 Sanctions for failure to disclose any potential conflicts of interest are referenced. |

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|---|---|
| Institution | University of California - Irvine School of Medicine |
| City | Orange, CA |
| Overall Grade | B |
| Overall Comments | University of California - Irvine cited the UC system-wide vendor relations policy as its complete submission for 2008 with no changes in 2009. 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 internal policies or develop new internal policies covering these domains. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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. |

| Institution | University of California - Irvine School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | <p>3</p> <p>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.</p> |
| Sales Reps- Score & Comments | <p>2</p> <p>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."</p> |
| On Campus- Score & Comments | <p>2</p> <p>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.</p> |
| Off Campus- Score & Comments | <p>3</p> <p>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.</p> |
| Industry Support- Score & Comments | <p>3</p> <p>UC system-wide vendor relations policy: Only the department may select the recipients of scholarships and grants funded by industry.</p> |
| Curriculum- Score & Comments | <p>3</p> <p>UC system-wide vendor relations policy: Mandatory training for all employees and students on proper interaction with vendors and the nature of marketing influence.</p> |
| Oversight- Score & Comments | <p>0</p> <p>UC system-wide vendor relations policy: No oversight established.</p> |
| Non-Compliance- Score & Comments | <p>0</p> <p>UC system-wide vendor relations policy: Sanctions not referenced.</p> |

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| Institution | University of California Davis School of Medicine |
| City | Sacramento, CA |
| Overall Grade | A |
| Overall Comments | <p>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 in 2008. 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. Due to a clarification in the Scorecard methodology, this institution's domain score for industry support of on-site educational events has changed from a 3 to a 2. This institution's evaluation was last updated: 6/3/2008, with the above mentioned evaluation revision updated 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>All gifts are prohibited, and a comprehensive explication indicates that meals, promotional items, education and travel are all banned as such.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>Speaking relationships are covered under the above consulting policy.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Samples- Score & Comments | <p style="text-align: center;">3</p> <p>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."</p> |

| Institution | University of California Davis School of Medicine |
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| Purchasing- Score & Comments | 3 |
| | Persons may not partake in decisions concerning entities with which they have financial conflicts. |
| Sales Reps- Score & Comments | 2 |
| | Vendors may be on-site only by invitation. |
| On Campus- Score & Comments | 2 |
| | Industry funds for continuing education must be deposited in a central fund at the Office of Continuing Medical Education, which then disburses all grants. The policy does not prevent industry from selecting the department that will receive the funds. |
| Off Campus- Score & Comments | 3 |
| | All funds for meeting attendance must be provided to Health Sciences Advancement, not directly to the recipient. Industry may not select award recipients. |
| Industry Support- Score & Comments | 3 |
| | The School of Medicine's gifts ban explicitly prohibits industry from earmarking scholarships and other trainee funds. |
| Curriculum- Score & Comments | 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- Score & Comments | 1 |
| | This policy establishes oversight. |
| Non-Compliance- Score & Comments | 1 |
| | This policy establishes sanctions. |

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|------------------------------|---|
| Institution | University of California Los Angeles - David Geffen School of Medicine |
| City | Los Angeles, CA |
| Overall Grade | A |
| Overall Comments | <p>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. In 2009, this institution submitted clarifications to its 2008 policy submission, resulting in changes to the comments for both the disclosure and the on-site education domains. Domain scores and overall grade for this institution remain the same. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>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.</p> |
| Consulting- Score & Comments | <p>1</p> <p>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.</p> |
| Speaking- Score & Comments | <p>1</p> <p>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.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>Annual internal disclosure of financial relationships is required, and commendably a certain tier of relationships require prior approval. Clarifying that faculty must file annual reports even when they do not have external relationships would help reduce the burden of compliance on faculty.</p> |
| Samples- Score & Comments | <p>3</p> <p>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.</p> |

| Institution | University of California Los Angeles - David Geffen School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 2 The School of Medicine indicates that site access will be overseen by leadership, but there are no more stringent limitations. |
| On Campus- Score & Comments | 2 ACCME standards regulate industry funding and content for educational events. Commendably, steps are taken above and beyond ACCME standards to remove industry promotional materials from such events, including directly sponsored meals whether on- or off-site. |
| Off Campus- Score & Comments | 3 This policy prohibits the receipt of gifts, payments and travel support from industry for attendance at off-site events. |
| Industry Support- Score & Comments | 3 This policy prevents industry from selecting recipients of funds. |
| Curriculum- Score & Comments | 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- Score & Comments | 1 This policy references an oversight body. |
| Non-Compliance- Score & Comments | 0 This policy does not reference sanctions. |

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| Institution | University of California San Diego School of Medicine |
| City | San Diego, CA |
| Overall Grade | B |
| Overall Comments | University of California San Diego School of Medicine relies on University of California system-wide vendor relations policies. 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>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.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>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.</p> |
| Samples- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |

| Institution | University of California San Diego School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 3 |
| | UC system-wide vendor relations policy: Only the department may select the recipients of scholarships and grants funded by industry. |
| Curriculum- Score & Comments | 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- Score & Comments | 0 |
| | UC system-wide vendor relations policy: No oversight established. |
| Non-Compliance- Score & Comments | 0 |
| | UC system-wide vendor relations policy: Sanctions not referenced. |

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| Institution | University of California San Francisco School of Medicine |
| City | San Francisco, CA |
| Overall Grade | A |
| Overall Comments | <p>With several excellent policies and a strong foundation, University of California San Francisco School of Medicine has a substantial overall conflict of interest policy. Model policies include the gifts, speaking relationships, travel to off-site CME, formulary decisions and scholarships funds. If this institution added language concerning consulting relationships and sanctions, their policy would meaningfully address all the domains. University of California San Francisco School of Medicine submitted one revised policy to the AMSA PharmFree Scorecard in 2009, which increased their domain scores for regulation of gifts and speaking relationships with industry. Their grade remains an A. This institution has not consented to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>"faculty, staff, students, and trainees may not accept gifts from industry."</p> |
| Consulting- Score & Comments | <p>1</p> <p>No applicable policy provided</p> |
| Speaking- Score & Comments | <p>3</p> <p>Faculty may not participate in speaker's bureaus and are solely responsible for the content of their lectures.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>Disclosure requirements appear only in a policy on conflicts of interest that pertain to receiving/dispersing 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.</p> |
| Samples- Score & Comments | <p>3</p> <p>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.</p> |

| Institution | University of California San Francisco School of Medicine |
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| Purchasing- Score & Comments | 3 |
| | Members of the P&T committee are required to recuse themselves from any decisions in which they have a financial interest |
| Sales Reps- Score & Comments | 2 |
| | Industry representatives are permitted in non-patient care areas only, by appointment. 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 Campus- Score & Comments | 2 |
| | All industry support of CME activities on-site must be unrestricted and go through departments or divisions (not individual faculty). The institution is solely responsible for determination of content. UC system-wide vendor relations policy: ACCME standards apply to both accredited and non-accredited educational events organized by UC system universities. |
| Off Campus- Score & Comments | 3 |
| | The institution prohibits acceptance of payment for attending CME events or travel funds that are not part of legitimate reimbursement for services rendered. 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. |
| Industry Support- Score & Comments | 3 |
| | All scholarships and trainee fund recipients will be determined by the institution, with no quid pro quo. UC system-wide vendor relations policy: Only the department may select the recipients of scholarships and grants funded by industry. |
| Curriculum- Score & Comments | 3 |
| | The policy addresses training in potential conflicts of interest and industry interactions. 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- Score & Comments | 1 |
| | Chancellor's Conflict of Interest Advisory Committee is responsible for overseeing conflicts of interest as assessed by the disclosure policy. |
| Non-Compliance- Score & Comments | 0 |
| | The School of Medicine has introduced guidelines only on conflicts of interest, and listed no sanctions for non-compliance. |

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| Institution | University of Chicago Pritzker School of Medicine |
| City | Chicago, IL |
| Overall Grade | B |
| Overall Comments | 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. This institution's evaluation was last updated: 3/3/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 2 Compensation for consulting relationships must be fair market value. |
| Speaking- Score & Comments | 2 Compensation for speaking engagements must be fair market value. |
| Disclosure- Score & Comments | 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- Score & Comments | 2 The institution centrally manages samples through its retail pharmacy and a voucher system. |

| Institution | University of Chicago Pritzker School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 2 Industry representatives are only permitted in non-patient care areas and must have an appointment. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 Oversight referenced |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced |

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|---|---|
| Institution | University of Cincinnati College of Medicine |
| City | Cincinnati, OH |
| Overall Grade | C |
| Overall Comments | 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. This institution's evaluation was last updated: 6/27/2008 |
| Gifts- Score & Comments | 3 The College of Medicine prohibits the acceptance of gifts under any circumstances. In addition, meals directly funded by industry are not permitted. |
| Consulting- Score & Comments | 2 Pre-approval of consulting relationships is required but there are no contract or payment stipulations. |
| Speaking- Score & Comments | 1 The policy exempts 'occasional lectures' from annual disclosure. No other applicable policy provided. |
| Disclosure- Score & Comments | 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- Score & Comments | 1 Though warning language about the use of samples as marketing tools is embedded in the policy, the institution makes no major steps to reconfigure a samples policy that curtails such influence. |

| Institution | University of Cincinnati College of Medicine |
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| Purchasing- Score & Comments | 1 No applicable policy provided. |
| Sales Reps- Score & Comments | 2 Though this policy indicates "appointments are mandatory," the language around site access does not expressly forbid uninvited visits by sales reps. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 3 Industry must not select recipient of the support. |
| Curriculum- Score & Comments | 3 Great module from Family Medicine course provided. |
| Oversight- Score & Comments | 1 Establishes an industry interactions committee charged with oversight, coordination, education, and interpretation of this policy. |
| Non-Compliance- Score & Comments | 1 This policy makes reference to sanctions. |

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|---|---|
| Institution | University of Colorado Denver School of Medicine |
| City | Denver, CO |
| Overall Grade | B |
| Overall Comments | <p>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. Due to a clarification in the Scorecard methodology, this institution's domain score for industry support of on-site educational events has changed from a 3 to a 2. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>This policy refers to required annual disclosure of all potential conflicts of interest for students, residents, faculty and staff.</p> |
| Samples- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |

| Institution | University of Colorado Denver School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 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. Industry may specify the activity for accredited CME, and may specify the department or division for non-accredited events. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 This policy references an implementation team. |
| Non-Compliance- Score & Comments | 0 This policy does not make reference to sanctions. |

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| Institution | University of Connecticut |
| City | Farmington, CT |
| Overall Grade | I |
| Overall Comments | <p>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. This institution indicated in 2008 it was drafting new policies to be completed during the 2008-2009 academic year. These were provisionally assessed. 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. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>This policy seems mainly aimed at trainee interactions with industry and does not address consulting relationships.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>This policy seems mainly aimed at trainee interactions with industry and does not address speaking engagements. ACCME standards apply only to on-site events.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>There is no provision for general disclosure. The only explicit requirements for disclosure apply to trainees' scholarly publications.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>The only explicit restriction on samples is that they not be used by trainees or faculty for themselves or family.</p> |

| Institution | University of Connecticut |
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| Purchasing- Score & Comments | 1 |
| | No part of the policy applies specifically to purchasing committee members. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 |
| | The School of Medicine requires that all on-site education programs adhere to ACCME standards for commercial support. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 1 |
| | No policy, or policy not provided. |
| Oversight- Score & Comments | 0 |
| | This policy does not designate a party responsible for oversight of trainee or faculty compliance. |
| Non-Compliance- Score & Comments | 0 |
| | There are no sanctions for noncompliance outlined in this policy. |

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| Institution | University of Florida College of Medicine |
| City | Gainesville, FL |
| Overall Grade | B |
| Overall Comments | University of Florida College of Medicine has a strong set of policies to limit and illuminate relationships between industry and its medical school faculty, staff and trainees. A strong and thoughtful samples policy as well as a broad unrequested grant stipulation for channeling industry support at the School-wide level make this policy a standout; its on-site education policy could be clarified to go beyond ACCME requirements, and its disclosure policy updated to require reporting of individual payments This institution's evaluation was last updated: 8/24/2008 |
| Gifts- Score & Comments | 3 COM faculty, residents, staff and students may not accept gifts from industry representatives or vendors regardless of the monetary value of the gift. Though: "Educational materials for COM faculty, residents, staff and students or for patients supplied by industry representatives or vendors is permitted provided such materials are preapproved by the COM Industry Academic Relations committee and are not "branded" by the supplier of the materials. |
| Consulting- Score & Comments | 2 Approval of consulting relationships will be granted if the relationship shown to be beneficial to the educational mission of the institution. Consulting arrangements are not required to be described in a formal contract, and there is no stipulation for legitimate services rendered or reasonable compensation. |
| Speaking- Score & Comments | 3 Speakers bureaus are discouraged by this policy, and such relationships are approved only if industry does not provide or approve the content, or if the attendees of the speaking engagement are chosen by or receive gifts or stipends from industry. |
| Disclosure- Score & Comments | 2 All COM faculty, residents and staff must annually disclose all outside interests using three income ranges: 0-5000; 5000-10,000, and greater than \$10,000. The Scorecard notes that under such a disclosure policy, the institution may miss the scope of important outside relationships that have been discovered through investigations in recent months. |
| Samples- Score & Comments | 2 This samples policy institutes a voucher system with exceptions available in narrow circumstances. The policy does not preclude sales reps from giving vouchers directly to doctors. |

| Institution | University of Florida College of Medicine |
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| Purchasing- Score & Comments | 3 This policy requires disclosure forms to be attached to requisitions for purchase, and if the employee charged with approving requisitions has a financial interest in the vendor, she cannot approve it. While this is a good start, The COM should establish a broader and more comprehensive recusal or committee selection policy for P&T committee members. |
| Sales Reps- Score & Comments | 2 On-site access by industry representatives or vendors is restricted to non-patient care and public areas only. Industry representatives and vendors are permitted access to patient care areas and non-public areas only when their presence is necessary for educational purposes and then only by appointment and, when appropriate, with the prior consent of the patient. |
| On Campus- Score & Comments | 2 ACCCME standards are referenced for all on-site educational events |
| Off Campus- Score & Comments | 3 Industry may support the general aims of COM education through an unrestricted grant to the school, but faculty, staff and resident are specifically banned from industry-furnished payments and stipends to attend off-site meetings. |
| Industry Support- Score & Comments | 3 Model language: COM faculty, residents, staff and students may not accept scholarships or fellowships to support training initiatives from industry representatives or vendors. Industry representatives or vendors requesting to support the educational mission of the COM may provide an unrestricted grant, which will be placed in a central fund and monitored/distributed by the COM Industry Academic Relations committee. There shall be no quid pro quo associated with such funding. |
| Curriculum- Score & Comments | 1 This school did not furnish curricular material. |
| Oversight- Score & Comments | 1 The academic relations committee is responsible for oversight |
| Non-Compliance- Score & Comments | 0 This policy stipulates sanctions. |

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| Institution | University of Hawai'i John A Burns School of Medicine |
| City | Honolulu, HI |
| Overall Grade | F |
| Overall Comments | <p>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. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>This institution did not provide a policy that requires any review of, or places limits on, staff and faculty consulting relationships beyond general disclosure.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>No policy, or policy not provided.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>All faculty and staff must disclose all potential conflicts of interest to supervisors on a regular basis.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>This institution is not a clinical facility and therefore does not have a samples policy.</p> |

| Institution | University of Hawai'i John A Burns School of Medicine |
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| Purchasing- Score & Comments | 1 This institution had indicated that it and its staff members do not make purchasing or formulary decisions. |
| Sales Reps- Score & Comments | 1 No policy, or policy not provided. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 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 documentation of such curricular content. |
| Oversight- Score & Comments | 0 This institution indicated there is nothing significant to oversee, and therefore has not created an oversight system. |
| Non-Compliance- Score & Comments | 1 Failure to comply with the disclosure portion of the policy carries the same sanctions as non-compliance with any other University policy. |

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| Institution | University of Illinois College of Medicine |
| City | Chicago, IL |
| Overall Grade | D |
| Overall Comments | <p>Despite some improvement since last year, overall, University of Illinois College of Medicine's conflict of interest policies remain generally weak. Strengths include a policy on consulting, which now requires prior approval of these relationships. A disclosure policy is also stronger than in previous years, as it requires annual disclosure of all financial relationships by faculty. However, in the majority of domains, there are limited restrictions. University of Illinois College of Medicine, Chicago, made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. AMSA was informed that the policies submitted by the Chicago campus also cover the University of Illinois campuses at Rockford, Peoria and Urbana-Champlain. The assessment for this set of policies remains a D. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>No policy or policy not provided.</p> |
| Consulting- Score & Comments | <p>2</p> <p>All consulting relationships must receive prior approval.</p> |
| Speaking- Score & Comments | <p>1</p> <p>There are no specific limits on speaking relationships, and they are further exempt from disclosure requirements.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>All personnel must disclose outside financial relationships annually and each time the relationship changes.</p> |
| Samples- Score & Comments | <p>1</p> <p>The institution has banned the inpatient use of samples, but outpatient samples are permitted. Concerningly, physicians' personal use of samples is explicitly permitted.</p> |

| Institution | University of Illinois College of Medicine |
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| Purchasing- Score & Comments | 1 No policy provided. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 1 No policy or policy not provided |
| Industry Support- Score & Comments | 1 No policy provided. |
| Curriculum- Score & Comments | 3 The institution's resident curriculum includes portions on managing encounters with industry representatives. |
| Oversight- Score & Comments | 1 Oversight established |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | University of Iowa Carver College of Medicine |
| City | Iowa City, IA |
| Overall Grade | A |
| Overall Comments | This institution's conflict of interest policies are strong for most of the domains on which it was assessed. The institution seeks to reduce the influence of industry marketing through bans on gifts and meals, both on site and off, as well as samples. Employee participation in industry speakers' bureaus is explicitly prohibited and the institution heavily regulates industry funding for medical education. The institution does not provide any detail on oversight of policy implementation or sanctions for noncompliance. This institution's evaluation was last updated: 8/16/2009 |
| Gifts- Score & Comments | 3 This policy bans all gifts and meals to staff, faculty and trainees, both on and off site. |
| Consulting- Score & Comments | 3 All consulting arrangements must be approved in advance and outlined in a time-limited contract with specific deliverables. |
| Speaking- Score & Comments | 3 The institution does not permit the acceptance of honoraria directly from industry. |
| Disclosure- Score & Comments | 2 Financial relationships with industry must be disclosed annually and also reported as they appear. |
| Samples- Score & Comments | 3 Samples and vouchers for medications may only be provided for those drugs that are specially approved through a special process. A drug's inclusion on the formulary does not necessarily indicate that it may be sampled. |

| Institution | University of Iowa Carver College of Medicine |
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| Purchasing- Score & Comments | 3 Faculty members may not participate in purchasing discussions if they or a family member have a personal financial relationship with the manufacturer of a product under consideration. |
| Sales Reps- Score & Comments | 2 Sales representatives are limited to pre-scheduled meetings with staff, and only in non-patient care areas. |
| On Campus- Score & Comments | 2 On site continuing medical education must adhere to ACCME guidelines. |
| Off Campus- Score & Comments | 3 All industry support for off-site education must be awarded through the Vice President for Medical Affairs. Industry sponsors may not participate in decisions on how to distribute the funds. |
| Industry Support- Score & Comments | 3 Industry may not select the recipient of scholarships it provides. |
| Curriculum- Score & Comments | 1 No information on this institution's curriculum were provided. |
| Oversight- Score & Comments | 0 Oversight is not established in provided policies |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced |

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| Institution | University of Kansas School of Medicine |
| City | Kansas City, KS |
| Overall Grade | B |
| Overall Comments | <p>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. This institution's evaluation was last updated: 6/3/2008</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>All gifts and meals are prohibited on- and off-campus, except within large settings "widely attended," such as professional society meetings.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>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 outpatient care, and doctors writing prescriptions for sample medication are responsible for patient education.</p> |

| Institution | University of Kansas School of Medicine |
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| Purchasing- Score & Comments | 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" |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 |
| | A central account, 'not designated for use by specific individuals,' will be used to deposit all educational grants from industry, which must be unrestricted. However, departments or division recipients may still be specified by industry. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 |
| | This policy specifies an oversight mechanism. |
| Non-Compliance- Score & Comments | 1 |
| | Sanctions referenced. |

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| Institution | University of Kentucky College of Medicine |
| City | Lexington, KY |
| Overall Grade | B |
| Overall Comments | <p>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. This institution's evaluation was last updated: 6/3/2008</p> |
| Gifts- Score & Comments | <p style="text-align: center;">1</p> <p>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.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">3</p> <p>Excellent language: "Vendor relationships with physicians"</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>No annual or periodic disclosure is required.</p> |
| Samples- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |

| Institution | University of Kentucky College of Medicine |
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| Purchasing- Score & Comments | 3 If a committee member has an applicable relationship or conflict, he/she may not participate in decision-making processes. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 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 |
| Industry Support- Score & Comments | 3 Industry may make scholarships available for students and trainees, but the recipients must be selected by the institution. |
| Curriculum- Score & Comments | 1 No policy or policy not provided |
| Oversight- Score & Comments | 1 The institution has designated responsibly for enforcement in its policies. |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | University of Louisville School of Medicine |
| City | Louisville, KY |
| Overall Grade | B |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 3 Vendors may not provide gifts of any form or value to staff or students. |
| Consulting- Score & Comments | 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- Score & Comments | 1 The institution strongly discourages paid lectureships, but no approval or limitation of speaking relationships is required. |
| Disclosure- Score & Comments | 2 Faculty and staff are required to disclose conflicts of interest to their superiors as they occur. |
| Samples- Score & Comments | 1 Each department will outline the list of acceptable sample medications in its formulary. A samples voucher plan is being developed with area pharmacies. |

| Institution | University of Louisville School of Medicine |
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| Purchasing- Score & Comments | 3 P&T members must recuse themselves from any decisions in cases where they are conflicted. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 Vendors may make educational grants, but may not select presenters or require inclusion or exclusion of specific medications in the program. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 1 The institution provided no policy specific to scholarships or other support for students or trainees |
| Curriculum- Score & Comments | 3 Schools and departments will develop education programs on vendor marketing and influences on physician decisions. |
| Oversight- Score & Comments | 1 Oversight established |
| Non-Compliance- Score & Comments | 1 Specific sanctions referenced |

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| Institution | University of Maryland School of Medicine |
| City | Baltimore, MD |
| Overall Grade | A |
| Overall Comments | This institution has several strong policies, including the policies on gifts, speaking, off-site education and scholarships. Strengthening the areas of CME, oversight and sanctions, and curriculum would make this an excellent policy. The University of Maryland School of Medicine submitted revised policies for the 2009 AMSA PharmFree Scorecard. Their grade improves from a D to a B. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 Faculty and students are not permitted to accept any gift from industry, which includes meals brought or purchased by representatives, on-campus or off. |
| Consulting- Score & Comments | 2 Faculty are required to have outside professional activities pre-approved. |
| Speaking- Score & Comments | 3 This institution has an exemplary speaking policy, explicitly banning faculty from participating in both 'speaker's bureaus' and conferences with industry controlling content. |
| Disclosure- Score & Comments | 2 Faculty are required to internally disclose outside professional activities. In addition, state law mandates faculty publicly file with the State Ethics Commission the details of sponsored research relationships. |
| Samples- Score & Comments | 1 This institution does not distribute pharmaceutical samples. |

| Institution | University of Maryland School of Medicine |
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| Purchasing- Score & Comments | 3 P&T Committees must consist of members with no financial relationships with manufacturers or vendors. |
| Sales Reps- Score & Comments | 2 Industry representatives are only permitted to meet with faculty by appointment, in non-patient care areas. |
| On Campus- Score & Comments | 2 Regulation of industry-sponsorship of CME activities is in accordance with ACCME policies. |
| Off Campus- Score & Comments | 3 Under the strong gift ban, "faculty must not accept gifts of travel funds from industry merely to participate in or attend medical education conferences". |
| Industry Support- Score & Comments | 3 All scholarships and funds must be received by the school's Foundation and are then disbursed solely at the direction of the school. |
| Curriculum- Score & Comments | 1 No curricular materials were provided. |
| Oversight- Score & Comments | 0 Although certain parts of the overall policy had oversight laid out, there was no party responsible for general oversight. |
| Non-Compliance- Score & Comments | 0 There was no mention of sanctions for noncompliance. |

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| Institution | University of Massachusetts Medical School |
| City | Worcester, MA |
| Overall Grade | B |
| Overall Comments | Clear, model language throughout is a hallmark of University of Massachusetts Medical School's policy on industry interactions. The Medical School supports this strong policy with a lucid and practical frequently asked questions document. The University of Massachusetts Medical School submitted a new vendor policy for the 2009 AMSA PharmFree Scorecard. Due to a clarification in the Scorecard methodology, this institution's domain score for industry support of on-site educational events has changed from a 3 to a 2, resulting in an overall grade change from an A to a B. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 All gifts and on-site industry funded meals are banned. (Indirect sponsoring of meals in CME events are allowed) Noteworthy: the Medical School will engage in an input and education process to phase in gifts policy for all medical staff. |
| Consulting- Score & Comments | 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: 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- Score & Comments | 3 Lecture content must be developed exclusively by the faculty member with no Clinical Vendor input or requirement for approval. Participation in speakers' bureaus is explicitly prohibited."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- Score & Comments | 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- Score & Comments | 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. |

| Institution | University of Massachusetts Medical School |
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| Purchasing- Score & Comments | 3 Clinical Personnel with any financial relationship with a Clinical Vendor may not be a member of the Pharmacy & Therapeutics Committee or any subcommittees."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. |
| Sales Reps- Score & Comments | 2 Vendors are allowed only in non-patient care areas and only by appointment. |
| On Campus- Score & Comments | 2 An oversight committee responsible for reviewing potential conflicts of interest that arise from industry sponsorship of CME and GME events. While the institution does stipulate centralization of industry funds supporting educational events, it does so at the departmental, rather than institutional level. This allows industry sponsors to continue to exert funding bias over topic selection for CME. |
| Off Campus- Score & Comments | 3 Travel funds and reimbursement are only permitted when legitimate professional services are being provided; such funds may not be accepted by attendees."No honoraria, travel or lodging cost may be covered if the employee is simply attending" an educational conference. |
| Industry Support- Score & Comments | 3 The recipients of scholarships or fellowships are chosen solely at the discretion of the department chair or the associate dean for graduate medical education, and the activity must be deemed to have educational merit. |
| Curriculum- Score & Comments | 1 No curriculum component of policy provided. |
| Oversight- Score & Comments | 1 Oversight established |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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|------------------------------|---|
| Institution | University of Medicine and Dentistry New Jersey - New Jersey Medical School |
| City | Newark, NJ |
| Overall Grade | I |
| Overall Comments | The University of Medicine and Dentistry of New Jersey has submitted new system-wide 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 0 |
| Consulting- Score & Comments | 0 |
| Speaking- Score & Comments | 0 |
| Disclosure- Score & Comments | 0 |
| Samples- Score & Comments | 0 |

| Institution | University of Medicine and Dentistry New Jersey - New Jersey Medical School |
|------------------------------------|---|
| Purchasing- Score & Comments | 0 |
| Sales Reps- Score & Comments | 0 |
| On Campus- Score & Comments | 0 |
| Off Campus- Score & Comments | 0 |
| Industry Support- Score & Comments | 0 |
| Curriculum- Score & Comments | 0 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | University of Medicine and Dentistry of New Jersey - Robert Wood Johnson Medical School |
| City | Piscataway, NJ |
| Overall Grade | I |
| Overall Comments | <p>The University of Medicine and Dentistry of New Jersey has submitted new system-wide 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. In 2008, UMDNJ Robert Wood Johnson school of medicine submitted 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. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>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.</p> |
| Consulting- Score & Comments | <p>1</p> <p>This policy refers to an Outside Employment policy that was not provided or available on the website (which notes it is under revision).</p> |
| Speaking- Score & Comments | <p>1</p> <p>This policy refers to an Outside Employment policy that was not provided or available on the website (which notes it is under revision).</p> |
| Disclosure- Score & Comments | <p>2</p> <p>This policy requires prompt and written disclosure of all conflicts and potential conflicts as they occur.</p> |
| Samples- Score & Comments | <p>1</p> <p>No policy, or policy not provided.</p> |

| Institution | University of Medicine and Dentistry of New Jersey - Robert Wood Johnson Medical School |
|------------------------------------|--|
| Purchasing- Score & Comments | 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 provision prevents this policy from receiving the highest score. |
| Sales Reps- Score & Comments | 1 No policy, or policy not provided. |
| On Campus- Score & Comments | 1 No policy, or policy not provided. |
| Off Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 1 These policies establish oversight, |
| Non-Compliance- Score & Comments | 0 These policies do not establish sanctions. |

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|------------------------------|---|
| Institution | University of Medicine and Dentistry of New Jersey – School of Osteopathic Medicine |
| City | Stratford, NJ |
| Overall Grade | I |
| Overall Comments | The University of Medicine and Dentistry of New Jersey has submitted new system-wide 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of Medicine and Dentistry of New Jersey – School of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | University of Michigan Medical School |
| City | Ann Arbor, MI |
| Overall Grade | B |
| Overall Comments | The University of Michigan Medical School has good policies. Highlights include 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 made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. This institution's grade remains unchanged; however language concerning review of consulting relationships has increased this domain score from a 2 to a 3. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 3 "Outside Interest disclosures occur annually and must be updated during the year should circumstances change or new Outside Interests arise level of compensation to ensure it is commensurate with the effort." |
| Speaking- Score & Comments | 2 There is nothing specifically on speaking relationships, but they would fall under this school's broad disclosure and review policy, which requires departmental review or review by a Conflict of Interest board. |
| Disclosure- Score & Comments | 2 Faculty (including Residents) are required to annually disclose outside interests and must update their disclosures during the year should circumstances change or new outside interests arise. However, Staff and Adjunct/Visiting Faculty are only required to disclose conflicts as they arise. |
| Samples- Score & Comments | 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. |

| Institution | University of Michigan Medical School |
|------------------------------------|--|
| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 |
| | The Medical School adheres to ACCME standards cited for CME-credit events on-site. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 1 |
| | The Medical School indicates that a new policy on scholarship/trainee funds is in development. |
| Curriculum- Score & Comments | 3 |
| | The Medical School provided materials for course curriculum, "Drug Development, Marketing and Industry Relationships" for first and second year medical students. |
| Oversight- Score & Comments | 1 |
| | This policy makes it clear that departments are responsible for oversight, with more broad oversight by the Conflict of Interest Board. |
| Non-Compliance- Score & Comments | 1 |
| | There are clear sanctions for noncompliance. |

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|------------------------------|--|
| Institution | University of Minnesota Medical School |
| City | Minneapolis, MN |
| Overall Grade | I |
| Overall Comments | <p>This institution has informed us that they are revising or developing their policies. However they have provided material for review. Most of the policies regulating conflict of interest at University of Minnesota Medical School demonstrate progress towards a model policy, but could be strengthened further. There are no policies regulating off-site educational events or pharmaceutical samples, and oversight and sanctions for noncompliance are not clearly established. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their status is In Process. Their grade improves provisionally from a D to a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>Gifts are prohibited, except for promotional items of nominal value. Industry sponsored on-site meals are prohibited, except for meals provided at events sponsored by multiple vendors.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>Consulting relationships must be described in a written contract, and compensation must be at fair market value.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>Faculty may not be paid for speaking engagements that are associated with sales or marketing, unless they are speaking in the context of a defined consultant role. Paid speaking relationships in general are subject to written agreements and fair market compensation.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">3</p> <p>Faculty with industry relationships must disclose these relationships on a public website. This website will be available to patients, colleagues, editors and students. Additionally, all faculty and staff who receive more than \$500 per year from any one source must disclose the relationship and compensation to the institution annually.</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>The policy requires central distribution of pharmaceutical samples.</p> |

| Institution | University of Minnesota Medical School |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 Committee members with a financial conflict of interest must recuse themselves from participating in any relevant purchasing decisions. |
| Sales Reps- Score & Comments | 1 No policy or policy not provided |
| On Campus- Score & Comments | 2 ACCME guidelines govern on-site educational activities. |
| Off Campus- Score & Comments | 1 No policy, or policy not provided. |
| Industry Support- Score & Comments | 2 Training opportunities provided to fellows must not be influenced by the sponsor. However, the policy does not include any more comprehensive guidelines governing industry support for trainees. |
| Curriculum- Score & Comments | 2 Training on conflict of interest arising from industry relationships is discussed |
| Oversight- Score & Comments | 0 The policy does not specify a party responsible for oversight. |
| Non-Compliance- Score & Comments | 0 Sanctions for noncompliance are not established. |

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|------------------------------|--|
| Institution | University of Mississippi School of Medicine |
| City | Jackson, MS |
| Overall Grade | C |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 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- Score & Comments | 2 Those wishing to consult must put arrangements in a formal contract, with identified and legitimate services, and compensation of fair market value. |
| Speaking- Score & Comments | 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- Score & Comments | 2 "Employees and academic/clinical units will report conflicts of interest and significant financial interests annually." |
| Samples- Score & Comments | 1 No policy or policy not provided |

| Institution | University of Mississippi School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 3 |
| | Those who are involved in institutional decisions regarding the purchase or approval of medical supplies or equipment "must not have any financial interest...in the companies that might benefit from the institutional decision." |
| Sales Reps- Score & Comments | 2 |
| | Vendors must have an appointment and may not enter patient care areas when visiting the institution. |
| On Campus- Score & Comments | 2 |
| | Both accredited and unaccredited educational events must follow ACCME standards for commercial support. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 1 |
| | No policy or policy not provided |
| Curriculum- Score & Comments | 1 |
| | No policy or policy not provided |
| Oversight- Score & Comments | 1 |
| | Oversight referenced |
| Non-Compliance- Score & Comments | 1 |
| | Sanctions referenced |

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|---|---|
| Institution | University of Missouri at Kansas City School of Medicine |
| City | Kansas City, MO |
| Overall Grade | C |
| Overall Comments | <p>The institution has advanced 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. This institution did not make a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Due to a clarification in the Scorecard methodology, this institution's domain score for industry support of on-site educational events has changed from a 3 to a 2, resulting in an overall grade change from a B to a C. This institution's evaluation was last updated: 6/3/2008, with the above mentioned domain change updated 6/16/2009.</p> |
| Gifts- Score & Comments | <p style="text-align: center;">3</p> <p>All gifts, services and meals from industry representatives are banned.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>No policy provided.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>Disclosure policies only cover those involved in research and those making purchasing decisions. For the latter, only significant financial interest (greater than \$10,000) are required</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |

| Institution | University of Missouri at Kansas City School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 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 Campus- Score & Comments | 2 Gifts and travel support for off-site event attendance are explicitly banned. |
| Industry Support- Score & Comments | 3 Industry may provide scholarships as long as the selection of recipients is controlled by institution |
| Curriculum- Score & Comments | 2 All covered persons receive training on conflicts of interest and interactions with industry, although it is not part of the curriculum. |
| Oversight- Score & Comments | 0 There is no mechanism for oversight and compliance |
| Non-Compliance- Score & Comments | 0 There are no clear sanctions for non-compliance |

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|------------------------------|---|
| Institution | University of Missouri-Columbia School of Medicine |
| City | Columbia, MO |
| Overall Grade | C |
| Overall Comments | 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 for workforce members to receive funding for attendance at off-site educational conferences. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 2 The institution puts a \$5 per item limit and a \$75 annual limit on gifts per vendor and per workforce member. It also cites AMA recommendations on gifts. |
| Consulting- Score & Comments | 2 Prior approval from Dean for consulting relationships is required |
| Speaking- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 No policy or policy not provided |

| Institution | University of Missouri-Columbia School of Medicine |
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| Purchasing- Score & Comments | 2 Disclosure of potential conflicts to the committee is required. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 3 Individuals may not be compensated for event attendance. Approval is required for travel support. |
| Industry Support- Score & Comments | 3 Institutional policy prevents industry from selecting the recipient of funding and scholarships. |
| Curriculum- Score & Comments | 1 No policy or policy not provided |
| Oversight- Score & Comments | 1 The Compliance Review Committee is cited as the responsible party to review disclosed conflicts of interest and make determinations on necessary corrective actions. |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced. |

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|------------------------------|---|
| Institution | University of Nebraska College of Medicine |
| City | Omaha, NE |
| Overall Grade | C |
| Overall Comments | While some policies of this institution are strong, such as those governing external consulting and scholarships, the policies overall do not have great potential to limit conflict of interest arising from relationships with the pharmaceutical industry. Gifts and meals are not banned and there are no significant limitations on samples or speaking arrangements. However, some policies are strong. The school submitted revised policies to the 2009 AMSA PharmFree Scorecard. Their grade changes from an I to a C. This institution has not indicated consent to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 Food and gifts of a value greater than \$25 are "discouraged", but not banned. Stronger language would earn this policy a higher score. |
| Consulting- Score & Comments | 3 The policy states that specific evidence of lack of bias must be documented in order for an activity to be approved. It also states that reimbursement may be accepted only if the payment is commensurate to the services rendered. |
| Speaking- Score & Comments | 1 Speaking engagements specifically do NOT require approval. |
| Disclosure- Score & Comments | 1 Personnel are required to disclose potential conflicts of interest for certain activities, but this is done once per activity, not on a periodic basis. |
| Samples- Score & Comments | 1 There are no significant limits on the distribution and use of samples. |

| Institution | University of Nebraska College of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 2 |
| | Individuals involved in purchasing decisions must disclose potential financial conflicts of interest to the purchasing unit or decision making committee. |
| Sales Reps- Score & Comments | 2 |
| | Vendors must have prior approval from a faculty member before being allowed in the medical center. |
| On Campus- Score & Comments | 2 |
| | Unrestricted educational grants from vendors are acceptable but must be given directly to the department involved and not directly to an individual. Faculty presenting at an on-site educational event must disclose potential conflicts of interest at the time of the presentation. |
| Off Campus- Score & Comments | 2 |
| | Industry may not provide funds for attendance at conferences or meetings, but the policy states specifically that faculty do NOT need approval or disclosure for reimbursement for travel. |
| Industry Support- Score & Comments | 3 |
| | Unrestricted educational grants from pharmaceutical companies are acceptable, but they must be given directly to the department, and not the individual. |
| Curriculum- Score & Comments | 2 |
| | All faculty, staff and trainees receive training regarding potential conflicts of interest in interactions with the industry; however, department chairs are responsible for determining the frequency and type of training, so training may vary significantly between departments. |
| Oversight- Score & Comments | 1 |
| | This policy establishes oversight. |
| Non-Compliance- Score & Comments | 1 |
| | This policy establishes sanctions. |

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| Institution | University of Nevada School of Medicine |
| City | Reno, NV |
| Overall Grade | C |
| Overall Comments | <p>It is clear that this institution is aware of the dangers of conflicts of interest that may arise due to relationships between physicians and pharmaceutical companies. However, their policy relies almost exclusively on disclosure of potential conflicts of interest to mediate this. The policy would be much stronger if more stringent limits were placed on areas that are known to influence physicians, such as gifts, drug samples, and industry influence on CME courses. However, it is worth noting that the institution does have a strong aspirational policy. This policy requires public disclosure of all industry affiliations; a gift ban which also includes prohibition of travel support, on-site meals, scholarships, and training subsidies; drug samples allowed only in special cases and a centralized distribution system for samples; no restricted funding of CME; barring of individuals with conflicts of interest from participation in purchasing decisions; and inclusion of how industry can influence clinical judgment in the medical curriculum. If adopted, this institution would have a much stronger policy and would consequently receive a much higher grade. However, scorecard credit for the aspirational policy may not be given until it is adopted. The University of Nevada School of Medicine submitted policies for the first time to the AMSA Pharm-Free Scorecard 2009, and provided additional materials post-launch. Their grade improves from an F in 2008 to a C in 2009. This institution's evaluation was last updated: 9/18/2009</p> |
| Gifts- Score & Comments | <p>2</p> <p>Students and residents may not accept gifts. For others, however, gifts are banned only in situations where it is likely to influence decision-making, where it is to reward an action taken, or where it is given in close proximity to a past, present, or future transaction between the AMC and the giver of the gift. This policy is too vague and thus does not significantly limit the influence of gifts, especially because many physicians may be unaware of the gift's potential to influence them.</p> |
| Consulting- Score & Comments | <p>2</p> <p>A written contract is required for external consulting relationships, but not review or approval.</p> |
| Speaking- Score & Comments | <p>1</p> <p>Faculty members are allowed to participate in "public addresses" at their own discretion.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>This institution has a fairly thorough disclosure policy that requires both annual and project-based disclosure of any potential conflicts of interest. However, all disclosures are considered confidential and are not required to be disclosed publicly or to patients. Were the aspirational policy approved, public disclosure would be required.</p> |
| Samples- Score & Comments | <p>1</p> <p>No policy or policy not submitted.</p> |

| Institution | University of Nevada School of Medicine |
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| Purchasing- Score & Comments | 2 Employees are not prohibited from participating in decisions in which they may have a conflict of interest, but participation in all such decisions is subject to approval and monitoring. |
| Sales Reps- Score & Comments | 2 Pharmaceutical sales representatives must meet with administrative staff, faculty, and residents by appointment only. |
| On Campus- Score & Comments | 1 It is not clear that policy language addressing on-site educational events covers all CME (i.e. for physicians, not just trainees) |
| Off Campus- Score & Comments | 1 No policy, or policy not submitted. |
| Industry Support- Score & Comments | 3 This institution receives a 3 in this domain because there is oversight on the giving of funds. However, it is concerning that there is no requirement preventing industry from choosing the individual recipient of funds. |
| Curriculum- Score & Comments | 3 Presentations provided clearly address pharmaceutical industry marketing and impact on prescribing. |
| Oversight- Score & Comments | 1 This policy establishes oversight. |
| Non-Compliance- Score & Comments | 1 This policy establishes sanctions. |

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| Institution | University of New England College of Osteopathic Medicine |
| City | Portland, ME |
| Overall Grade | F |
| Overall Comments | 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. This institution's evaluation was last updated: 6/26/2008 |
| Gifts- Score & Comments | 1 No policy or policy not provided |
| Consulting- Score & Comments | 1 This policy indicates that consulting agreements will be self-managed by the faculty. |
| Speaking- Score & Comments | 1 No policy or policy not provided |
| Disclosure- Score & Comments | 1 This annual disclosure policy begins at a \$10,000 floor. |
| Samples- Score & Comments | 1 No policy or policy not provided |

| Institution | University of New England College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 1 No policy or policy not provided |
| On Campus- Score & Comments | 1 No policy or policy not provided |
| Off Campus- Score & Comments | 1 No policy or policy not provided |
| Industry Support- Score & Comments | 1 No policy or policy not provided |
| Curriculum- Score & Comments | 1 No policy or policy not provided |
| Oversight- Score & Comments | 1 This policy references oversight. |
| Non-Compliance- Score & Comments | 1 This policy references sanctions. |

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| Institution | University of New Mexico School of Medicine |
| City | Albuquerque, NM |
| Overall Grade | B |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 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- Score & Comments | 2 Consulting engagements must have only fair market compensation commensurate with legitimate services provided. |
| Speaking- Score & Comments | 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- Score & Comments | 1 This policy makes reference to annual disclosure for those involved in research, but no general disclosure for staff. |
| Samples- Score & Comments | 2 A physician considering the use of samples must contact the Director of Pharmacy, a requirement which represents some limit on samples. |

| Institution | University of New Mexico School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 |
| | Members of purchasing committees must disclose all potential conflicts of interest and recuse themselves from the process. |
| Sales Reps- Score & Comments | 1 |
| | This policy makes reference to site access restrictions that are not provided. |
| On Campus- Score & Comments | 2 |
| | All educational events at the School of Medicine are subject to the ACCME standards for commercial support. |
| Off Campus- Score & Comments | 2 |
| | Policy restrictions for travel and other off-site compensation from industry apply only to trainees and students. |
| Industry Support- Score & Comments | 3 |
| | Industry may not play a role in choosing the recipients of scholarships for students or trainees. |
| Curriculum- Score & Comments | 1 |
| | No policy, or policy not provided. |
| Oversight- Score & Comments | 0 |
| | This policy does not establish a party responsible for oversight. |
| Non-Compliance- Score & Comments | 0 |
| | This policy does not make reference to sanctions. |

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| Institution | University of North Carolina - Chapel Hill School of Medicine |
| City | Chapel Hill, NC |
| Overall Grade | B |
| Overall Comments | <p>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. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>The School of Medicine prohibits the acceptance of personal gifts, cash, incentives or rebates by institution staff and modest meals may be provided only in connection with educational events.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">3</p> <p>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.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">2</p> <p>As with consulting, the School of Medicine requires pre-approval of all speaking relationships for which the speaker receives compensation.</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">1</p> <p>No policy for general disclosure provided.</p> |
| Samples- Score & Comments | <p style="text-align: center;">2</p> <p>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 not address other ways in which samples affect prescriber behavior.</p> |

| Institution | University of North Carolina - Chapel Hill School of Medicine |
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| Purchasing- Score & Comments | 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. |
| Sales Reps- Score & Comments | 2 This policy bans vendors from the School of Medicine unless they have an appointment, and then only in non-patient areas. |
| On Campus- Score & Comments | 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. 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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, if the institution considers residents to be staff. |
| Curriculum- Score & Comments | 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- Score & Comments | 1 The responsible party for oversight in each domain is set forth in the Enforcement section. |
| Non-Compliance- Score & Comments | 1 This policy outlines possible sanctions for noncompliance. |

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| Institution | University of North Dakota School of Medicine |
| City | Grand Forks, ND |
| Overall Grade | I |
| Overall Comments | <p>This institution has informed us that they are revising or developing their policies. However they have provided material for review. University of North Dakota School of Medicine has excellent policies concerning gifts and scholarship and trainee funds, with good policies in site access and speaking relationships. However, few other policies applied to assessed domains in a meaningful way. University of North Dakota School of Medicine submitted policies for the first time to the AMSA PharmFree Scorecard in 2009. Their status is in-process. Their provisional assessment based on draft policies is a D. This institution has not consented to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>All gifts and industry funded meals are prohibited</p> |
| Consulting- Score & Comments | <p>1</p> <p>Faculty consulting relationships with industry are only required to be reported to the Office of the Associate Dean for Academic Affairs.</p> |
| Speaking- Score & Comments | <p>2</p> <p>Faculty should not participate in speakers' bureaus.</p> |
| Disclosure- Score & Comments | <p>1</p> <p>No applicable policy provided.</p> |
| Samples- Score & Comments | <p>1</p> <p>No applicable policy provided.</p> |

| Institution | University of North Dakota School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 This institution does not operate a formulary. |
| Sales Reps- Score & Comments | 2 Industry representatives are only permitted in "designated non-patient care areas by appointment or invitation." |
| On Campus- Score & Comments | 2 This institution cites ACCME standards for their interactions with industry regarding CME. |
| Off Campus- Score & Comments | 1 No applicable policy provided. |
| Industry Support- Score & Comments | 3 "Industry support for scholarships and stipends should be given to [the institution], which should have sole responsibility for selection of recipients." |
| Curriculum- Score & Comments | 1 No applicable curricular materials or policies provided. |
| Oversight- Score & Comments | 0 No party responsible for oversight was noted. |
| Non-Compliance- Score & Comments | 0 Sanctions for noncompliance were not mentioned. |

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| Institution | University of North Texas Health Science Center at Fort Worth - Texas College of Osteopathic Medicine |
| City | Fort Worth, TX |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 The institution requires gifts over \$250 be reported to the President. |
| Consulting- Score & Comments | 3 Employees must receive approval before engaging in outside professional activities such as consulting. In addition, pay must be commensurate to the task. |
| Speaking- Score & Comments | 2 The institution allows faculty to receive reimbursements for travel related to speaking engagements, but not to receive honoraria for those services. |
| Disclosure- Score & Comments | 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- Score & Comments | 1 No policy or policy not provided |

| Institution | University of North Texas Health Science Center at Fort Worth - Texas College of Osteopathic Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 No policy or policy not provided |
| Sales Reps- Score & Comments | 1 No policy or policy not provided |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 1 The institution does not prevent the receipt of gifts for simply attending conferences or educational events. |
| Industry Support- Score & Comments | 1 No policy or policy not provided |
| Curriculum- Score & Comments | 1 The institution has not provided evidence of a curricular requirement covering conflict of interest and marketing by the pharmaceutical industry |
| Oversight- Score & Comments | 1 There is a Conflicts of Interest Committee whose members are appointed annually by the institution President. |
| Non-Compliance- Score & Comments | 1 Sanctions are outlined in the policies. |

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| Institution | University of Oklahoma College of Medicine |
| City | Oklahoma City, OK |
| Overall Grade | C |
| Overall Comments | Most of the policies at this institution somewhat limit the potential for conflicts of interest. The policy on purchasing and formularies is exemplary, as are the limits placed on scholarships for students and trainees. However, disclosure of financial ties is not required, conflict of interest and the influence of industry marketing on medical decision-making are not covered in the medical school curriculum, and there are no meaningful limits on the use of samples as a marketing tool. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from a D to a C. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 This policy prohibits all gifts, but allows "modest meals or snacks provided as part of a formal educational program." |
| Consulting- Score & Comments | 2 The policy specifies that consultant fees "should be commensurate with the level of service provided." Additionally, fees should not be accepted for simply attending events or for having loose connections with pharmaceutical companies. |
| Speaking- Score & Comments | 2 Physicians and residents may serve as educational speakers, but must not serve as promotional speakers |
| Disclosure- Score & Comments | 1 A policy requiring annual or periodic disclosure of financial ties with the pharmaceutical industry was not provided |
| Samples- Score & Comments | 1 Samples are allowed for patient use, and the policy does not place any substantial limitations on the use of samples as a marketing tool. |

| Institution | University of Oklahoma College of Medicine |
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| Purchasing- Score & Comments | 3 |
| | Exemplary policy: "Health care professionals who serve on any committees dealing with pharmacy, formulary, equipment or device selection, or clinical practice guidelines shall disclose to the respective committee membership any consulting or sponsoring relationships they have with any commercial entity during the time or their committee service and for two years after termination of the relationship. Such professionals should recuse themselves from any committee decisions which may suggest conflict from their commercial relationship(s)." |
| Sales Reps- Score & Comments | 2 |
| | Industry sales representatives are only allowed on-site in non-patient care areas by appointment or invitation from a physician or, in the case of medical students, by appointment or invitation from the supervising physician. |
| On Campus- Score & Comments | 2 |
| | Industry cannot control speakers/content, but contributions do not need to be at institutional level. |
| Off Campus- Score & Comments | 2 |
| | Financial assistance for off-site education is permitted, but only when attendees are selected by the AMC supervisor and the grants are unrestricted and given directly to the AMC supervising unit, not the attendee. |
| Industry Support- Score & Comments | 3 |
| | The policy prohibits industry from selecting the recipient(s) of scholarships or trainee funds. |
| Curriculum- Score & Comments | 1 |
| | There is no evidence that the medical school curriculum covers industry marketing influence and conflict of interest in a substantial way. |
| Oversight- Score & Comments | 1 |
| | The policy makes clear which individuals are responsible for oversight and ensuring compliance. |
| Non-Compliance- Score & Comments | 1 |
| | Sanctions referenced |

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|------------------------------|--|
| Institution | University of Pennsylvania School of Medicine |
| City | Philadelphia, PA |
| Overall Grade | A |
| Overall Comments | 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. University of Pennsylvania School of Medicine submitted new, strong, curricular material to the AMSA PharmFree Scorecard in 2009. Their grade remains an A. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 2 The School of Medicine has banned completely gifts and meals provided directly by pharmaceutical representatives, although indirect funding of meals is permitted. |
| Consulting- Score & Comments | 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- Score & Comments | 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- Score & Comments | 1 The School of Medicine provided no disclosure policy. |
| Samples- Score & Comments | 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. |

| Institution | University of Pennsylvania School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 3 Faculty members with financial conflicts of interest are forbidden from serving on purchasing committees. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 3 The curricular materials demonstrate that this institution covers conflict of interest and the effects of pharmaceutical marketing on health care decision-making by physicians in a thorough, meaningful way. 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- Score & Comments | 1 Various named parties are responsible for the implementation of the guidelines given. |
| Non-Compliance- Score & Comments | 0 Possible sanctions for non-compliance with the guidelines were not provided. |

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| Institution | University of Pittsburgh Medical Center |
| City | Pittsburgh, PA |
| Overall Grade | A |
| Overall Comments | 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; UPMC has indicated a separate working group is addressing this issue. Due to a clarification in the Scorecard methodology, this institution's domain score for industry support of on-site educational events has changed from a 3 to a 2. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 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- Score & Comments | 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- Score & Comments | 2 Internal disclosure of all industry relationships is required annually and as needed when new relationships arise. |
| Samples- Score & Comments | 3 This institution is implementing a centralized sample medication system that removes the interaction between prescribers and vendors |

| Institution | University of Pittsburgh Medical Center |
|------------------------------------|--|
| Purchasing- Score & Comments | 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." |
| Sales Reps- Score & Comments | 2 |
| | Industry representatives must be invited by a health care provider for a specific purpose in order to enter the institution. |
| On Campus- Score & Comments | 2 |
| | UPMC mandates that all funds for educational events be centralized through the Center for Continuing Education on Health Sciences. However, the policy does not prevent industry from specifying the department that will receive the funds. |
| Off Campus- Score & Comments | 3 |
| | UPMC does not allow industry to pay travel expenses or reimbursement for attendance at off-site educational events or meetings |
| Industry Support- Score & Comments | 3 |
| | Students may receive scholarship or other industry funding, but such funds must go into a centralized pool, and no earmarking is permitted. |
| Curriculum- Score & Comments | 1 |
| | UPMC indicated that there is a separate working group considering the curriculum. |
| Oversight- Score & Comments | 1 |
| | Responsibility for oversight and compliance is clearly outlined in the policies. |
| Non-Compliance- Score & Comments | 1 |
| | A list of possible sanctions for noncompliance are given. |

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| Institution | University of Puerto Rico School of Medicine |
| City | San Juan, PR |
| Overall Grade | F |
| Overall Comments | This institution responded to the request for policies by noting they had no policies for any of the assessed domains. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of Puerto Rico School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|--|
| Institution | University of Rochester Medical Center School of Medicine |
| City | Rochester, NY |
| Overall Grade | C |
| Overall Comments | <p>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. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p style="text-align: center;">2</p> <p>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.</p> |
| Consulting- Score & Comments | <p style="text-align: center;">1</p> <p>Though this policy discusses the possibility of influence in consulting relationships, no policy limits made.</p> |
| Speaking- Score & Comments | <p style="text-align: center;">1</p> <p>Speaking engagements are excluded from interests that need to be disclosed at the institution</p> |
| Disclosure- Score & Comments | <p style="text-align: center;">2</p> <p>Disclosure required of all faculty within 60 days of hire and then annually thereafter.</p> |
| Samples- Score & Comments | <p style="text-align: center;">1</p> <p>Samples are permitted, according to patient-benefit gifts clause.</p> |

| Institution | University of Rochester Medical Center School of Medicine |
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| Purchasing- Score & Comments | 2 Members of purchasing/formulary committees required to disclose all potential conflicts, and other members shall decide whether that person will recuse themselves. |
| Sales Reps- Score & Comments | 2 Industry representatives are allowed on campus only by appointment, and only in non patient care areas. |
| On Campus- Score & Comments | 2 Contributions 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 3 Provision of scholarships by industry acceptable as long as the institution selects the recipient. |
| Curriculum- Score & Comments | 3 Detailed curricular material attached. |
| Oversight- Score & Comments | 1 "School deans or University counterparts, or their designees, are responsible for ensuring implementation of these policies..." |
| Non-Compliance- Score & Comments | 1 This policy references sanctions |

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|------------------------------|--|
| Institution | University of South Alabama - College of Medicine |
| City | Mobile, AL |
| Overall Grade | F |
| Overall Comments | This institution provided only policies governing consulting relationships and annual disclosure. This institution's evaluation was last updated: 8/16/2009 |
| Gifts- Score & Comments | 1 |
| | No policy provided. |
| Consulting- Score & Comments | 2 |
| | Consulting agreements must be submitted in writing to the department chair before they begin. |
| Speaking- Score & Comments | 1 |
| | No policy provided. |
| Disclosure- Score & Comments | 2 |
| | Internal disclosure of all financial conflicts is required. Disclosure to the public or to patients may be required under certain conflict management plans. |
| Samples- Score & Comments | 1 |
| | No policy provided. |

| Institution | University of South Alabama - College of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 No policy provided. |
| Sales Reps- Score & Comments | 1 No policy provided. |
| On Campus- Score & Comments | 1 No policy provided. |
| Off Campus- Score & Comments | 1 No policy provided. |
| Industry Support- Score & Comments | 1 No policy provided. |
| Curriculum- Score & Comments | 1 No policy provided. |
| Oversight- Score & Comments | 1 Oversight by dept. chair, dean, and conflict of interest committee. |
| Non-Compliance- Score & Comments | 1 Sanctions established in relation to disclosure policy |

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|------------------------------|---|
| Institution | University of South Carolina School of Medicine |
| City | Columbia, SC |
| Overall Grade | I |
| Overall Comments | In 2009, this institution informed us for the first time that they are revising or developing new policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of South Carolina School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|---|---|
| Institution | University of South Dakota Sanford School of Medicine |
| City | Vermillion, SD |
| Overall Grade | D |
| Overall Comments | <p>This institution's policies were generally weak. A redeeming factor was the included outline for the Ethics Discussion for students. Domain scores for this school were assessed by the actual policies provided. A set of commendable ethics principles, if implemented into actual policy, would greatly improve domain scores. The University of South Dakota Sanford School of Medicine made its first submission of policies to the 2009 AMSA PharmFree Scorecard. Its grade improves from an F to a D. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>The Ethics Principles ban all gifts, including pens and mugs. However, these are not full policies, and the Policy Manual later states a \$200 gift limit.</p> |
| Consulting- Score & Comments | <p>1</p> <p>The policy does not stipulate review of outside consulting. Annual disclosure of outside activities is only required when these activities require regular work days to be missed.</p> |
| Speaking- Score & Comments | <p>1</p> <p>No policy, or policy not provided</p> |
| Disclosure- Score & Comments | <p>2</p> <p>Full-time employees are required to disclose their professional relationships annually.</p> |
| Samples- Score & Comments | <p>1</p> <p>Physicians are encouraged to carefully consider using free samples for patients. However, there is no other language regulating pharmaceutical samples.</p> |

| Institution | University of South Dakota Sanford School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 No policy, or policy not provided |
| Sales Reps- Score & Comments | 2 Industry representatives may only meet with physicians by appointment and only in non-patient care areas. |
| On Campus- Score & Comments | 2 This institution adheres to ACCME and ACGME standards, but does not further attempt to address bias in industry funded continuing education. |
| Off Campus- Score & Comments | 1 No policy, or policy not provided |
| Industry Support- Score & Comments | 1 No policy, or policy not provided |
| Curriculum- Score & Comments | 3 A provided outline for an Ethics Discussion raises important questions and issues around the pharmaceutical industry's influence on the medical profession. |
| Oversight- Score & Comments | 0 No party named for oversight |
| Non-Compliance- Score & Comments | 0 Sanctions not referenced |

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|------------------------------|--|
| Institution | University of South Florida College of Medicine |
| City | Tampa, FL |
| Overall Grade | C |
| Overall Comments | <p>Noteworthy among University of South Florida College of Medicine's conflict of interest policies are clear restrictions on consulting relationships and prohibition of reimbursement for travel and attendance at off-site educational events. Other areas show only moderate progress towards an ideal policy, and in some cases there is no relevant policy at all. This institution made a submission for the first time to the AMSA PharmFree Scorecard in 2009. Their grade improves from an I to a C. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>Although marketing products, such as pens or notepads with logos, are prohibited, educational gifts of modest value may be accepted on an occasional basis. Meals of modest value, in conjunction with "informational/educational presentation by Industry" are also allowed.</p> |
| Consulting- Score & Comments | <p>3</p> <p>Consulting relationships must be disclosed and approved, and they must be subject to a written agreement. Additionally, payment must be commensurate to services rendered.</p> |
| Speaking- Score & Comments | <p>2</p> <p>Speaking relationships must be disclosed and approved, and compensation must be commensurate to services rendered.</p> |
| Disclosure- Score & Comments | <p>1</p> <p>No policy or policy not provided.</p> |
| Samples- Score & Comments | <p>1</p> <p>This policy does not adequately address the potential for samples to be used as a marketing tool.</p> |

| Institution | University of South Florida College of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 This institution does not operate a formulary |
| Sales Reps- Score & Comments | 2 Industry sales representatives may meet with faculty by appointment only. |
| On Campus- Score & Comments | 1 No policy or policy not provided. |
| Off Campus- Score & Comments | 3 Faculty are prohibited from accepting reimbursement from industry for attending and traveling to off-site educational events. |
| Industry Support- Score & Comments | 3 "Distribution of funds for trainee attendance at professional meetings shall be exercised at the discretion of the institution independent of Industry direction or influence." |
| Curriculum- Score & Comments | 1 There is not yet a policy governing the inclusion of conflict of interest in the medical school curriculum. However, this institution has indicated that they are in the process of developing such a curricular policy for the 2009-2010 academic year. |
| Oversight- Score & Comments | 0 No party has been identified as responsible for oversight. |
| Non-Compliance- Score & Comments | 1 Faculty and staff will be given a grace period until January 1, 2010, at which point there will be sanctions for noncompliance as appropriate. |

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|------------------------------|--|
| Institution | University of Tennessee College of Medicine - Memphis |
| City | Memphis, TN |
| Overall Grade | F |
| Overall Comments | This institution did not provide policies for assessment, or demonstrate ongoing policy development, after remaining In Process for one year. Their grade therefore reverts to an F. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of Tennessee College of Medicine - Memphis |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|--|
| Institution | University of Texas Health Science Center at Houston |
| City | Houston, TX |
| Overall Grade | I |
| Overall Comments | This institution is currently revising its policies. This institution submitted draft policies, or demonstrated an ongoing policy development process, allowing their In Process designation to be extended beyond one year. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of Texas Health Science Center at Houston |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|---|
| Institution | University of Texas Health Science Center at San Antonio - School of Medicine |
| City | San Antonio, TX |
| Overall Grade | B |
| Overall Comments | University of Texas Health Science Center at San Antonio - School of Medicine has submitted strong policies governing industry relationships. Highlights of their submission include a very stringent policy on gifts and industry-sponsored meals, as well as commendable language on consulting arrangements and P&T committees. Limiting this school's overall score is a weak samples policy and the absence of policies or materials covering conflicts of interest in the curriculum. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from a C to a B. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 "clinicians or researchers may not accept any form of personal gift from industry or its representatives;.Meals funded directly by industry should not be provided on the AMC campus, nor at AMC-sponsored events held in off-campus locations." |
| Consulting- Score & Comments | 3 Consulting agreements between faculty members and industry must be set down in writing, and faculty may "accept only fair market compensation for specific, legitimate services" provided to industry |
| Speaking- Score & Comments | 2 Clinicians and researchers are prohibited from participating in or being compensated for speeches that are written by industry. |
| Disclosure- Score & Comments | 2 Clinicians and researchers as defined by the policy should file an annual conflict of interest report listing their past and expected financial interests that exceed \$10,000 per year. Removal of this floor would make this policy stronger. |
| Samples- Score & Comments | 1 This policy only states that free samples must not be sold or used by clinicians, researchers, or their families. |

| Institution | University of Texas Health Science Center at San Antonio - School of Medicine |
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| Purchasing- Score & Comments | 3 Though it's unclear whether a financial relationship with industry precludes one from being on the P&T committee entirely, this policy unambiguously prohibits such faculty from making P&T decisions while holding such an interest. |
| Sales Reps- Score & Comments | 2 Industry representatives must meet with faculty only in non-patient care areas, unless "there is a clear educational or patient care benefit." |
| On Campus- Score & Comments | 2 This institution requires adherence to ACCME standards for commercial support, whether or not CME credit is awarded. |
| Off Campus- Score & Comments | 3 All payments and gifts for attending off-site CME or industry-specific events prohibited |
| Industry Support- Score & Comments | 3 This policy mandates that scholarship recipients be selected by department or institution, and not be subject to any quid pro quo. |
| Curriculum- Score & Comments | 1 No policy provided. |
| Oversight- Score & Comments | 1 This policy stipulates oversight. |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | University of Texas Medical Branch at Galveston |
| City | Galveston, TX |
| Overall Grade | A |
| Overall Comments | 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 to be cited for illustrative purposes. This institution's evaluation was last updated: 10/21/2008 |
| Gifts- Score & Comments | 3 Gifts and on-campus meals are banned with the exception of those provided during approved educational activities. |
| Consulting- Score & Comments | 3 Consulting agreements must be in writing, with reasonable fair market compensation for legitimate services, and must have prior institutional approval. |
| Speaking- Score & Comments | 2 Speaking engagements require prior institutional approval. |
| Disclosure- Score & Comments | 2 All faculty staff engaged in research must annually disclose all conflicts to the university. |
| Samples- Score & Comments | 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. |

| Institution | University of Texas Medical Branch at Galveston |
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| Purchasing- Score & Comments | 3 Those making purchasing decisions are barred from having financial or other conflicts of interest in companies that may be affected by such decisions. |
| Sales Reps- Score & Comments | 2 Vendors must have an appointment and are prohibited from patient care areas. |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 3 Travel and other compensation to outside events prohibited. It should be noted, however, that acceptance of de minimis gifts at off-campus events is explicitly allowed, perpetuating the inappropriate effects that gifts may have on prescribing. |
| Industry Support- Score & Comments | 3 The scholarship policy requires faculty to select trainee recipients, and prohibits quid pro quo for selection. |
| Curriculum- Score & Comments | 1 No curricular content provided, though the medical school notes that industry is not involved in curricular design or implementation. |
| Oversight- Score & Comments | 1 Conflict of interest committee has oversight. |
| Non-Compliance- Score & Comments | 1 Clear sanctions delineated within policy. |

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| Institution | University of Texas Southwestern Medical School |
| City | Dallas, TX |
| Overall Grade | B |
| Overall Comments | <p>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. The University of Texas Southwestern Medical School has included for the 2009 AMSA PharmFree Scorecard a detailed outline of a lecture concerning pharmaceutical companies, their relationships with doctors and an overview of research and development. Their grade remains a B. This institution has not indicated consent to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>2</p> <p>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.</p> |
| Consulting- Score & Comments | <p>3</p> <p>The Medical School requires pre-approval of any outside consulting arrangements by faculty.</p> |
| Speaking- Score & Comments | <p>2</p> <p>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.</p> |
| Disclosure- Score & Comments | <p>2</p> <p>Annual disclosure of all actual and potential conflicts of interest to the University's Conflict of Interest Office is required.</p> |
| Samples- Score & Comments | <p>1</p> <p>The only restriction the Medical School places on samples is that they not be used by physicians for themselves or their family members.</p> |

| Institution | University of Texas Southwestern Medical School |
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| Purchasing- Score & Comments | 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." |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 |
| | The Medical School requires that all on-site educational activities adhere to ACCME guidelines. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 2 |
| | While the enclosed outline for an applicable lecture addresses pharmaceutical marketing methods, it does not contain a thorough discussion on the influence pharmaceutical industry marketing can have on physicians. |
| Oversight- Score & Comments | 1 |
| | Oversight is established in the disclosure and consulting portions of the policy. |
| Non-Compliance- Score & Comments | 0 |
| | Sanctions only listed in research section, and are not considered applicable to assessed domains. |

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| Institution | University of Toledo College of Medicine |
| City | Toledo, OH |
| Overall Grade | I |
| Overall Comments | Overall, University of Toledo College of Medicine has a solid conflict of interest policy, with excellent language concerning gifts and on-site meals, formulary committees and travel to off-site events. This institution's curriculum is also of note, using "Mentored Drug Rep Lunches" to try to replicate what could happen to them as physicians and to evaluate the effects upon prescribing patterns. University of Toledo College of Medicine submitted new policies, some still in draft form, to the AMSA PharmFree Scorecard in 2009. Although their status is in-process, an assessment of their draft policies earns this institution a provisional grade of B. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 All meals and gifts of any value are banned in this model policy |
| Consulting- Score & Comments | 1 No policy, or policy not provided. |
| Speaking- Score & Comments | 2 This institution strongly discourages faculty participation in speakers bureaus, although they are not prohibited. In order to participate, faculty must provide balanced presentations, disclose the presentation and dates of the activities to the institution, and utilize personal or vacation time for such activities. |
| Disclosure- Score & Comments | 2 At the minimum, all faculty and staff are required to internally disclose their financial and industry relationships annually. Disclosure is also required in other instances, such as teaching a course, upon first employment and any change in the relationship with industry. |
| Samples- Score & Comments | 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. |

| Institution | University of Toledo College of Medicine |
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| Purchasing- Score & Comments | 3 Persons in a position to influence university decisions that could have a financial personal benefit cannot participate in those decisions. |
| Sales Reps- Score & Comments | 2 Industry representatives are permitted on site by prior appointment only |
| On Campus- Score & Comments | 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 Campus- Score & Comments | 3 Faculty, students and trainees are not permitted to accept payment for attendance for non-CME activities and are not permitted to receive any direct travel funds from industry. |
| Industry Support- Score & Comments | 3 All scholarship and trainee funds must either go through the relevant Department or the institution's Foundation, with the institution choosing the recipient with no quid pro quo. |
| Curriculum- Score & Comments | 3 This institution's curricular materials show that they are very strong in educating students on the effects of industry marketing on physicians through unique modules and role-plays. |
| Oversight- Score & Comments | 1 The Office of Institutional Compliance is responsible for oversight. |
| Non-Compliance- Score & Comments | 0 Sanctions for noncompliance aren't mentioned or outlined. |

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| Institution | University of Utah School of Medicine |
| City | Salt Lake City, UT |
| Overall Grade | I |
| Overall Comments | In 2009 this institution demonstrated an ongoing policy development process, allowing their In Process designation to be extended beyond one year. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | University of Utah School of Medicine |
|------------------------------------|---------------------------------------|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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| Institution | University of Vermont College of Medicine |
| City | Burlington, VT |
| Overall Grade | B |
| Overall Comments | University of Vermont College of Medicine's policies are generally consistent with guidelines put forth by the ACCME. This institution has taken an important step in banning all on-site meals and gifts. For the most part, policies submitted for the primary training site align with the College of Medicine's policies. There is no clear mechanism for oversight and compliance of the policies. This institution made a new or revised policy submission to the AMSA PharmFree Scorecard in 2009. Their grade improves from a C to a B. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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- Score & Comments | 3 The primary training site for this institution has multiple safeguards to ensure that consulting relationships are appropriate. |
| Speaking- Score & Comments | 3 The primary training site for this institution explicitly bans employee participation in speaker bureaus. In addition, speakers should determine their own lecture content and provide balanced information. |
| Disclosure- Score & Comments | 1 Disclosure of financial interests with industry is required in some circumstances, but is limited to those serving on formulary committees and complying with ACCME. No general disclosure is required. |
| Samples- Score & Comments | 1 While this institution does generally address the issue of samples in a Q&A document, asserting that they are considering a policy, the primary training site's policies do not place any restrictions on the use of samples. |

| Institution | University of Vermont College of Medicine |
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| Purchasing- Score & Comments | 2 |
| | The College of Medicine requires disclosure for those making decisions on equipment or drug purchases and allows the purchasing unit to require individuals to recuse themselves from such decision-making. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 |
| | All educational events sponsored by the College must adhere to ACCME standards. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 1 |
| | Policy or materials not provided |
| Oversight- Score & Comments | 1 |
| | The primary training site outlines potential penalties for non-compliance with its conflict of interest policies. |
| Non-Compliance- Score & Comments | 0 |
| | No system to enforce or actively oversee compliance with policies was provided. |

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| Institution | University of Virginia School of Medicine |
| City | Charlottesville, VA |
| Overall Grade | B |
| Overall Comments | At the University of Virginia School of Medicine all on-site meals and gifts are banned, with a small exception for patient materials. Disclosure of outside financial relationships is required on a regular basis. There are moderate restrictions in most domains. This policy, however, does not appear to be geared toward students, as there was no evidence provided that conflict of interest is covered by the institution's curriculum in a meaningful way. There was no policy provided governing industry support of scholarships and/or trainee funds. The University of Virginia School of Medicine submitted revised policies for the 2009 AMSA PharmFree Scorecard, and submitted additional materials after the 2009 launch. After post-launch scoring, their grade improves from a C to a B. This institution's evaluation was last updated: 9/28/2009 |
| Gifts- Score & Comments | 3 This institution is currently revising its conflicts of interest policy, but has applied a medical center policy on gifts. The policy bans receipt of all gifts, promotional items and industry meals. |
| Consulting- Score & Comments | 2 Faculty must obtain prior written approval from department chairs and the dean before entering into compensated consulting agreements. Policies provided do not clearly indicate that contracts are required for all consulting arrangements, or that payment be commensurate to the task. |
| Speaking- Score & Comments | 2 Faculty are permitted to speak at events approved by an accredited CME body. However, speaking at non-accredited events introduces requirements that content be controlled solely by the speaker and that industry not supply the presentation materials to the speaker. While there is no explicit limit on length of speaking relationships, the institution provides a number of clear examples of inappropriate activity, including: "Presentations that are "packaged" with other promotional activities, such that there is an implied endorsement." |
| Disclosure- Score & Comments | 2 School of Medicine faculty must disclose relationships that may raise questions of conflict of commitment or interest as soon as such situations arise. On annual basis faculty are required to disclose outside professional activities and financial interests. |
| Samples- Score & Comments | 2 Existing policy states that samples may be provided to outpatients only as either on a trial, introductory basis to assess efficacy and safety, or in special circumstances, such as when a patient does not have access to their community pharmacy, or if the patient has limited financial resources. This institution has indicated that it is revising its samples policy, and previously noted that they expect to ban sample medications in the clinics. Upon doing so, they will be eligible to receive a score of 3 in this domain. |

| Institution | University of Virginia School of Medicine |
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| Purchasing- Score & Comments | 3 This policy prohibits those with a financial or other personal interest in the decisions from participating in procurement activities. A university policy applicable to this domain is currently under revision. |
| Sales Reps- Score & Comments | 2 Industry sales representatives may only meet with faculty by appointment and in non-patient care areas. |
| On Campus- Score & Comments | 2 The institution accepts only unrestricted gifts as sponsorship for educational programs and requires that all events conform to ACCME standards. |
| Off Campus- Score & Comments | 3 A Covered Person may accept Vendor paid travel provided such travel is approved in advance by the Covered Person's supervisor, with written confirmation from Medical Center Procurement demonstrating that the travel is in conjunction with a procurement process or for purposes of product inspection, training and education. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided |
| Curriculum- Score & Comments | 1 The institution has not demonstrated that financial conflicts of interest and the effect of pharmaceutical marketing on physicians' prescribing patterns are covered in a meaningful way in the medical school curriculum. |
| Oversight- Score & Comments | 1 Oversight is established. |
| Non-Compliance- Score & Comments | 1 Sanctions referenced. |

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| Institution | University of Washington School of Medicine |
| City | Seattle, WA |
| Overall Grade | B |
| Overall Comments | This institution has introduced a far-reaching set of policies to prevent and manage conflicts of interest. A ban on the acceptance of personal gifts and industry meals by faculty is accompanied by a policy containing increased scrutiny of industry relationships. This institution has not indicated consent to allow the public posting of their policies. This institution's evaluation was last updated: 8/16/2009 |
| Gifts- Score & Comments | 3 Covered persons may not accept and form of personal gift, including meals, from industry. |
| Consulting- Score & Comments | 3 Covered persons must obtain prior approval to engage in consulting activities. Consulting agreements must also be set forth in writing. |
| Speaking- Score & Comments | 2 Speaking engagements must be consistent with the institution's Outside Professional Work policy. The policy requires pre-approval for any compensated outside professional engagement. |
| Disclosure- Score & Comments | 3 This institution requires that all faculty, librarians, and other academic personnel submit an Annual Report of Outside Activities. Disclosures will be made available on an internal website, and the information considered within the public domain. |
| Samples- Score & Comments | 2 This institution notes the use of samples as a marketing tool in its pharmacy policy. There is a formal process by which practitioners may request samples of specific medications and strict guidelines for the storage and administration of authorized samples. |

| Institution | University of Washington School of Medicine |
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| Purchasing- Score & Comments | 3 Faculty must recuse themselves from any decisions regarding products produced by companies with which they have a financial relationship. |
| Sales Reps- Score & Comments | 1 The policy of one affiliated medical center requires that sales representatives have an appointment to meet with staff in clinical areas and provides stricter rules governing their presence in the operating room. The policy does not, however, restrict representatives from patient care areas. |
| On Campus- Score & Comments | 3 The institution requires adherence to ACCME guidelines for CME activities, whether or not CME credit is granted. The policy also states that industry funded education be unrestricted with respect to content, topic and speaker. |
| Off Campus- Score & Comments | 3 Faculty may not accept funds for attending or to defray expenses related to off-site education. |
| Industry Support- Score & Comments | 3 "Vendor sponsorship of GME educational activities should take place under unrestricted grants and gifts only." Industry may not identify a specific recipient to whom scholarship or grant awards should be directed |
| Curriculum- Score & Comments | 1 No curricular material provided. |
| Oversight- Score & Comments | 1 Department chairs and division heads will ensure compliance with policies. |
| Non-Compliance- Score & Comments | 0 This institution noted in its submission that documents outlining requirements for compliance and oversight are not yet available for release. |

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| Institution | University of Wisconsin School of Medicine and Public Health |
| City | Madison, WI |
| Overall Grade | B |
| Overall Comments | 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. The University of Wisconsin School of Medicine and Public Health has submitted a new student policy for the 2009 AMSA PharmFree Scorecard. Their grade remains a B. This institution has not consented to allow the public posting of their policies. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 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. |
| Consulting- Score & Comments | 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- Score & Comments | 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 existing speaking relationships among faculty and reviews some of those relationships (those of faculty in federally-funded or human subjects research.) |
| Disclosure- Score & Comments | 2 Institution staff must annually disclose all external relationships. |
| Samples- Score & Comments | 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. |

| Institution | University of Wisconsin School of Medicine and Public Health |
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| Purchasing- Score & Comments | 3 Members of purchasing or formulary committees may not participate in decisions wherein they have possible conflicts of interest. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 2 Industry is allowed to donate money to students "indirectly," but industry choice of the recipient of the funds is not explicitly prohibited. However, because companies must discuss indirect donations to students with the dean of the appropriate school, oversight is established. |
| Curriculum- Score & Comments | 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- Score & Comments | 1 These policies cite responsible parties for oversight of CME conflicts of interest policies. |
| Non-Compliance- Score & Comments | 1 These policies outline sanctions for noncompliance with the CME conflicts of interest policies. |

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| Institution | Vanderbilt University School of Medicine |
| City | Nashville, TN |
| Overall Grade | B |
| Overall Comments | <p>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. However, Vanderbilt could improve upon its score by streamlining its policies and by establishing a party for oversight. Vanderbilt University School of Medicine submitted revised policies for the 2009 AMSA PharmFree Scorecard. Domain scores were increased for new policy language regulating pharmaceutical samples and provision of curricular materials. Their grade remains a B. Vanderbilt University School of Medicine requested a reassessment of their policies on June 16, 2009, with a focus on the domains covering consulting agreements and on-campus educational activities. The conducted reassessment did not alter this institution's score. This institution's evaluation was last updated: 8/16/2009</p> |
| Gifts- Score & Comments | <p>3</p> <p>Personnel may not accept any gifts, regardless of nature or value, or any meals, off or on-site, funded directly by industry. Admirably, the institution bans branded items of clothing and branded items carried on the person</p> |
| Consulting- Score & Comments | <p>2</p> <p>Consulting relationships between Vanderbilt Medical Center faculty and industry are required to be described in a formal contract, which must receive prior approval by the medical center department chair only if payment exceeds \$10,000/year. Payment must be commensurate with time and effort for specific services rendered. Vanderbilt University faculty must submit agreements for institutional review prior to engaging in outside activities that have the appearance of creating conflicts of interest. However, as defined in the policy, business relationships with companies where the individual is not in a position to influence a University relationship with that company are not generally considered conflicts. Therefore it seems that consulting arrangements meeting the above exception would not be subject to prior review.</p> |
| Speaking- Score & Comments | <p>3</p> <p>Very strong. 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 in advance. Vanderbilt medical center policies also state that VUMC personnel may not be paid speakers by MECCs that work solely for industry, must be responsible for their content, ensure it is balanced, and may not promote off-label uses when paid by industry</p> |
| Disclosure- Score & Comments | <p>2</p> <p>All personnel are required to internally disclose situations or relationships that create or have the appearance of creating a conflict of interest upon initial employment and every year thereafter.</p> |
| Samples- Score & Comments | <p>2</p> <p>Samples are not allowed to be distributed directly in any way to a practitioner on-site. Off-site satellite clinics are not subject to these sample restrictions.</p> |

| Institution | Vanderbilt University School of Medicine |
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| Purchasing- Score & Comments | 3 Members of the University community may not review or approve contracts or business relationships when that member has a financial interest with the company involved. |
| Sales Reps- Score & Comments | 2 Vendors are permitted access via advance appointments, but prohibited from visiting students or accessing patient areas. An Electronic Marketing Plan is used to manage appointments. |
| On Campus- Score & Comments | 2 This domain assesses institutional controls on industry financial support of on-site educational events, and on industry's ability to influence presentation content or speaker selection. In addition to compliance with ACCME standards for both accredited and unaccredited programs, this institution states that all agreements of grants supporting educational events at the School of Medicine must receive prior approval from the Division of Continuing Medical Education. The institution does not require that industry support of CME be pooled at the institutional (not departmental) level -- an element required for highest marks in this domain. |
| Off Campus- Score & Comments | 3 Model language: "personnel may not accept compensation from industry, including the defraying of costs, for simply attending a CME or other activity." |
| Industry Support- Score & Comments | 3 This policy effectively prevents industry from selecting the award recipient of scholarships and funds. |
| Curriculum- Score & Comments | 3 The provided curricular material clearly seeks to educate students on the intent and impact of the pharmaceutical industry upon physicians. It also summarizes and references key Vanderbilt conflict of interest policies in a clear manner. |
| Oversight- Score & Comments | 1 An office for oversight is clearly established. |
| Non-Compliance- Score & Comments | 1 Though no party for oversight or compliance of policies is mentioned, infractions may result in educational or disciplinary action. |

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| Institution | Virginia Commonwealth University School of Medicine |
| City | Richmond, VA |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 1 No policy, or policy not provided. |
| Consulting- Score & Comments | 2 This policy requires prior approval for all consulting relationships, which may not exceed one day per calendar week. |
| Speaking- Score & Comments | 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- Score & Comments | 2 Annual disclosure is required for all full-time faculty engaged in "outside professional activities," as defined by the institution. |
| Samples- Score & Comments | 1 The School of Medicine samples policy creates procedures for their acceptance, but does not significantly limit use of samples as a marketing tool. |

| Institution | Virginia Commonwealth University School of Medicine |
|------------------------------------|--|
| Purchasing- Score & Comments | 1 No policy, or policy not provided. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 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 Campus- Score & Comments | 1 No applicable policy. |
| Industry Support- Score & Comments | 1 No policy, or policy not provided. |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 1 Various parties named for oversight. |
| Non-Compliance- Score & Comments | 1 Sanctions referenced. |

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| Institution | Wake Forest University School of Medicine |
| City | Winston-Salem, NC |
| Overall Grade | I |
| Overall Comments | <p>In 2008, 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. These policies are described below and received a grade of "D." This institution has not consented to allow portions of their policy be cited for illustrative purposes. In 2009, this institution indicated in their submission that a new set of policies is currently working its way through the approval process. Therefore, this institution receives an "In Process" designation. This institution's evaluation was last updated: 6/16/2009</p> |
| Gifts- Score & Comments | <p>1</p> <p>The limits on gifts outlined in the policies do not go beyond those in AMA and PhRMA guidelines.</p> |
| Consulting- Score & Comments | <p>2</p> <p>Paid advisory arrangements must be approved by the department chairman. In addition, payments for consulting must be commensurate for services provided.</p> |
| Speaking- Score & Comments | <p>1</p> <p>No policy or policy not provided</p> |
| Disclosure- Score & Comments | <p>2</p> <p>The institution requires faculty with significant financial conflicts of interest to file an annual disclosure form.</p> |
| Samples- Score & Comments | <p>1</p> <p>The institution policy bans the distribution of non-formulary sample medications. However, no policies have been provided stipulating further regulation of samples.</p> |

| Institution | Wake Forest University School of Medicine |
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| Purchasing- Score & Comments | 1 No policy or policy not provided |
| Sales Reps- Score & Comments | 2 Industry sales representatives must sign in upon arrival and must have a pre-scheduled appointment. |
| On Campus- Score & Comments | 2 The institution requires adherence to ACCME standards for on-site CME activities. |
| Off Campus- Score & Comments | 1 No policy, or policy not provided |
| Industry Support- Score & Comments | 1 No policy, or policy not provided |
| Curriculum- Score & Comments | 1 No policy, or policy not provided |
| Oversight- Score & Comments | 1 COI Review Committee provides oversight |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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|------------------------------|---|
| Institution | Washington University School of Medicine |
| City | St. Louis, MO |
| Overall Grade | I |
| Overall Comments | <p>This institution has strong policy in the areas of gifts, consulting, and on- and off-site education. The school has not provided any evidence that the medical school curriculum covers conflicts of interest arising from financial relationships with the pharmaceutical industry in a meaningful way. All other domains are subject to moderate restrictions. Washington University School of Medicine submitted four additional policies to the 2009 AMSA PharmFree Scorecard, leading to increased scores for policies governing external speaking relationships and industry-sponsored scholarships. Their grade remains a B. This institution's evaluation was last updated: 6/16/2009 Update June 1st, 2010 Washington University School of Medicine submitted new policies to the Scorecard for reassessment on February 22nd, 2010, after the 2009 assessment period had ended. New policies will be assessed for the 2010 Scorecard, until which time Washington University's grade has been changed from a B to "In Process".</p> |
| Gifts- Score & Comments | <p>3</p> <p>All on-site meals and gifts are banned.</p> |
| Consulting- Score & Comments | <p>2</p> <p>Consulting relationships must be described in a written agreement, and compensation must be reasonable and appropriate.</p> |
| Speaking- Score & Comments | <p>2</p> <p>Speaking arrangements are subject to disclosure and review, and must have a written contract and provide reasonable compensation. Additionally, "speakers should have sole editorial discretion as to lecture content and materials."</p> |
| Disclosure- Score & Comments | <p>2</p> <p>All financial relationships with industry must be disclosed. Disclosure to patients is required, but only in cases in which the faculty member receives more than \$10,000 per year.</p> |
| Samples- Score & Comments | <p>2</p> <p>Sample use must be approved by the Department Chair. Samples are only permitted for use by patients with financial hardship and patients for whom samples may help determine the most effective treatment.</p> |

| Institution | Washington University School of Medicine |
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| Purchasing- Score & Comments | 2 Purchasing and Formulary committee members must disclose their financial conflicts. |
| Sales Reps- Score & Comments | 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 Campus- Score & Comments | 2 The institution is responsible for the content of all educational programs as well as the selection of speakers. All support by industry for CME must be approved. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 3 Unrestricted grants are allowed with the approval of the Department Chair, as long as "the content of the educational program and related materials [are] under the exclusive control of [the institution]" |
| Curriculum- Score & Comments | 1 No policy, or policy not provided. |
| Oversight- Score & Comments | 1 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. |
| Non-Compliance- Score & Comments | 1 The School of Medicine outlines clear sanctions for noncompliance with conflicts of interest policies. |

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| Institution | Wayne State University School of Medicine |
| City | Detroit, MI |
| Overall Grade | F |
| Overall Comments | This institution responded to the request for policies by noting they had no policies for any of the assessed domains. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | Wayne State University School of Medicine |
|------------------------------------|---|
| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|--|
| Institution | Weill Medical College of Cornell University |
| City | New York, NY |
| Overall Grade | D |
| Overall Comments | 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. This institution's evaluation was last updated: 6/26/2008 |
| Gifts- Score & Comments | 1 No policy or policy not provided |
| Consulting- Score & Comments | 1 No policy or policy not provided |
| Speaking- Score & Comments | 1 No policy or policy not provided |
| Disclosure- Score & Comments | 2 Annual disclosure required of all faculty and staff, regardless of potential conflicts. |
| Samples- Score & Comments | 1 No policy or policy not provided |

| Institution | Weill Medical College of Cornell University |
|------------------------------------|--|
| Purchasing- Score & Comments | 2 Members of purchasing committees must disclose via annual disclosure procedure. |
| Sales Reps- Score & Comments | 1 No policy or policy not provided |
| On Campus- Score & Comments | 1 No policy or policy not provided |
| Off Campus- Score & Comments | 1 No policy or policy not provided |
| Industry Support- Score & Comments | 1 No policy or policy not provided |
| Curriculum- Score & Comments | 1 No policy or policy not provided |
| Oversight- Score & Comments | 1 This policy references oversight. |
| Non-Compliance- Score & Comments | 1 This policy references sanctions. |

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| Institution | West Virginia School of Osteopathic Medicine |
| City | Lewisburg, WV |
| Overall Grade | F |
| Overall Comments | This institution responded to the request for policies by noting they had no policies for any of the assessed domains. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 1 |
| Consulting- Score & Comments | 1 |
| Speaking- Score & Comments | 1 |
| Disclosure- Score & Comments | 1 |
| Samples- Score & Comments | 1 |

| Institution | West Virginia School of Osteopathic Medicine |
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| Purchasing- Score & Comments | 1 |
| Sales Reps- Score & Comments | 1 |
| On Campus- Score & Comments | 1 |
| Off Campus- Score & Comments | 1 |
| Industry Support- Score & Comments | 1 |
| Curriculum- Score & Comments | 1 |
| Oversight- Score & Comments | 0 |
| Non-Compliance- Score & Comments | 0 |

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|------------------------------|--|
| Institution | West Virginia University School of Medicine |
| City | Morgantown, WV |
| Overall Grade | C |
| Overall Comments | As a whole, West Virginia University School of Medicine's conflicts of interest policies receive average marks. However it is important to note that this institution has put forth policies in every assessed domain that on some level address conflicts of interest. West Virginia University School of Medicine submitted revised policies for review on June 18, 2009. Their grade improves from a D to a C. This institution made an original submission to the scorecard in 2008, and new policies were submitted in 2009. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 12/11/2009 |
| Gifts- Score & Comments | 2 In its submission this institution referenced a state law on gifts that applies to its employees. The law allows for items of nominal value to be given, which the institution defines as under \$25. |
| Consulting- Score & Comments | 2 Prior approval of consulting arrangements in which a faculty or staff member receives compensation is required to align with provisions in the state ethics laws. |
| Speaking- Score & Comments | 1 Speaking relationships must be reported and are limited to one work day per week. This provision would not seem to reduce long-term speaking relationships such as speakers' bureaus. |
| Disclosure- Score & Comments | 2 Faculty and staff with financial interests in, or consulting for, the pharmaceutical industry must annually disclose such financial relationships. |
| Samples- Score & Comments | 1 Samples may only be delivered to department offices, and a samples log for individual employees will be cross-checked with employee financial disclosures. This later provision is innovative. However, these policies are not likely to limit the use of samples as a marketing tool. |

| Institution | West Virginia University School of Medicine |
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| Purchasing- Score & Comments | 2 All members of the formulary committee are required to complete a Procurement Integrity Disclosure Form. Those with a financial conflict of interest must not participate in deliberations on products from companies with which they have a financial conflict, as determined on a case-by-case basis. |
| Sales Reps- Score & Comments | 2 Industry sales representatives are not permitted in patient care areas except in special circumstances when invited by clinicians to assist in procedures involving company equipment. |
| On Campus- Score & Comments | 2 All continuing education events must be in accordance with ACCME standards. |
| Off Campus- Score & Comments | 2 Faculty, staff and trainees can only accept reimbursement for off-site educational events in accordance with other policies, but other policies provided don't limit these payments. |
| Industry Support- Score & Comments | 3 Industry may not select the recipient of scholarship funds and industry must not control lecture content. |
| Curriculum- Score & Comments | 1 Materials submitted for assessment in the curriculum domain include documents and publications prepared by outside organizations relevant to industry-physician relationships. |
| Oversight- Score & Comments | 0 Policies provided did not clearly establish oversight. |
| Non-Compliance- Score & Comments | 1 Sanctions referenced |

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| Institution | Western University of Health Sciences - College of Osteopathic Medicine of the Pacific |
| City | Pomona, CA |
| Overall Grade | F |
| Overall Comments | 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. This institution's evaluation was last updated: 7/29/2008 |
| Gifts- Score & Comments | 1 No policy or policy not provided |
| Consulting- Score & Comments | 1 No policy or policy not provided |
| Speaking- Score & Comments | 1 No policy or policy not provided |
| Disclosure- Score & Comments | 1 Disclosure applies only to researchers |
| Samples- Score & Comments | 1 No policy or policy not provided |

| Institution | Western University of Health Sciences - College of Osteopathic Medicine of the Pacific |
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| Purchasing- Score & Comments | 1 |
| | Disclosure policy applies, but only applicable to researchers and those with more than 'de minimis' relationships, which are not defined herein. |
| Sales Reps- Score & Comments | 1 |
| | No policy or policy not provided |
| On Campus- Score & Comments | 1 |
| | No policy or policy not provided |
| Off Campus- Score & Comments | 1 |
| | No policy or policy not provided |
| Industry Support- Score & Comments | 1 |
| | No policy or policy not provided |
| Curriculum- Score & Comments | 1 |
| | No policy or policy not provided |
| Oversight- Score & Comments | 1 |
| | This policy references oversight. |
| Non-Compliance- Score & Comments | 1 |
| | This policy references sanctions. |

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| Institution | Wright State University Boonshoft School of Medicine |
| City | Dayton, OH |
| Overall Grade | C |
| Overall Comments | Overall, Wright State University Boonshoft School of Medicine has a good conflict of interest policy, with excellent language concerning gifts and consulting relationships and a strong section on speaking relationships. However, other policy sections corresponding to the scorecard domains were less strong, although many were in the average range of policies for medical schools. Wright State University Boonshoft School of Medicine submitted selected new policies to the AMSA PharmFree Scorecard in 2009. Their grade improves from an F to a C. This institution has not consented to allow their policy to be publicly posted or quoted for illustrative purposes. This institution's evaluation was last updated: 6/16/2009 |
| Gifts- Score & Comments | 3 This institution has a complete ban on all meals and gifts, including medical textbooks and educational gifts. |
| Consulting- Score & Comments | 3 All collaborations with industry sponsors must have a written agreement approved by the Department Chairperson, with compensation at fair market value. |
| Speaking- Score & Comments | 2 Although this institution does not mention speaker bureaus, all collaborations with industry sponsors must have a written agreement approved by the Department Chairperson, with compensation at fair market value. |
| Disclosure- Score & Comments | 2 All faculty are required to complete a disclosure form upon first employment, annually thereafter and upon starting industry-sponsored research. |
| Samples- Score & Comments | 2 Although samples are not required to be dispensed through the pharmacy, samples may only be used for low-income patients and for a therapeutic trial before a full prescription. |

| Institution | Wright State University Boonshoft School of Medicine |
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| Purchasing- Score & Comments | 1 Institution does not purchase prescription medicines |
| Sales Reps- Score & Comments | 2 Industry representatives are only permitted on site with an appointment approved in advance by the Department Chairperson. |
| On Campus- Score & Comments | 2 Industry may supply 'unrestricted educational grants' that are unconditional. The institution retains total control over the educational content of all programs, and also cites ACCME standards for all CME activities. |
| Off Campus- Score & Comments | 1 Although travel funds to faculty are prohibited under the gift ban, this policy doesn't specify whether it applies to travel for off-site CME events, or whether students may accept such travel support. |
| Industry Support- Score & Comments | 1 No policy or policy not provided |
| Curriculum- Score & Comments | 1 Although it was indicated that conflicts of interest training was covered in a 2nd year course, no materials or official policies were included to verify this information. |
| Oversight- Score & Comments | 1 Oversight is noted. |
| Non-Compliance- Score & Comments | 1 Sanctions for noncompliance are referenced. |

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| Institution | Yale University School of Medicine |
| City | New Haven, CT |
| Overall Grade | C* |
| Overall Comments | An ambitious set of guidelines has 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. If implemented as policy, the submitted guidelines would earn a B; because they are guidelines, however, this policy receives a C*. This institution's evaluation was last updated: 6/3/2008 |
| Gifts- Score & Comments | 3 This School of Medicine completely bans all gifts and on-site meals. |
| Consulting- Score & Comments | 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- Score & Comments | 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- Score & Comments | 2 The guidelines suggest physicians internally disclose all potential and real conflicts of interest annually. |
| Samples- Score & Comments | 1 The guidelines place no restrictions on samples that would significantly limit their use as a marketing tool for pharmaceutical companies. |

| Institution | Yale University School of Medicine |
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| Purchasing- Score & Comments | 3 Physicians contributing to institutional purchasing decisions at Yale must not have any financial interest in the companies manufacturing the products under consideration. |
| Sales Reps- Score & Comments | 2 Pharmaceutical representatives are only permitted in non-patient care areas. |
| On Campus- Score & Comments | 2 The guidelines suggest that all on-site educational activities comply with ACCME standards, whether or not CME credit is awarded. |
| Off Campus- Score & Comments | 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. |
| Industry Support- Score & Comments | 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- Score & Comments | 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- Score & Comments | 0 Policies are guidelines only. |
| Non-Compliance- Score & Comments | 0 Policies are guidelines only. |