Healthcare Vendor Relations Policy
School of Veterinary Medicine Guidelines

These guidelines are designed to clarify the implementation procedures for ensuring School of Veterinary Medicine compliance with the University of California Healthcare Vendor Policy,
http://www.ucop.edu/ucophome/coordrev/policy/PP031208Policy.pdf

A Healthcare Vendor is defined as a company or its representative or the agent of a company that either produces or markets drugs, devices, nutritional products, or other medical products or services.
Examples of a healthcare vendor are pharmaceutical companies, medical supply companies, and pet food companies.

A. Gifts and Compensation Provided by Healthcare Vendors

1. Healthcare vendors may make unrestricted gifts to the University. Vendors may not directly provide food or any other gifts to University faculty, staff or students. Healthcare vendors may be invited to speak at specific program events, however any donations/unrestricted gifts made by the healthcare vendor may not be tied specifically to a particular speaking engagement.

2. It is acceptable for healthcare vendors to pay the University a specified sum to set up a booth at a University event. Items of small value may be provided by vendors to University faculty, staff or students who visit a booth, or who attend a presentation made by the vendor, if the give-away items are left in a central location, and made available to all participants.

3. Healthcare vendors may not pay travel expenses for faculty, staff or students to attend courses or other events sponsored by the vendor. Vendors may, however, make unrestricted gifts to the University, and those gifts may be used to cover travel expenses. Any donations/unrestricted gifts made by the healthcare vendor may not be tied specifically to travel expenses to events sponsored by the vendor. Vendors may compensate faculty members for travel and effort associated with evaluation of vendor products or services via a research or consulting agreement. Faculty members are required to adhere to the Strict Full-time Salary policy.

4. Supplies donated by healthcare vendors may not be used on an on-going basis for patient care purposes. Supplies donated may be provided free of charge to patients for evaluation purposes for first time use only, no prescription refills. Vendors may donate their product to a unit of the University if the administrative head of the unit approves the donation and the donation is restricted to use in University-sanctioned free clinics, to regular clinics for low income and

indigent patients, or for teaching purposes that do not involve client-owned animals. The quantity provided to the patient must be sufficient for either the complete course of treatment or, if continuing therapy is indicated, a substantial amount so that other sources of treatment can be sought.

Sample donations are also subject to all other policies of the University, including those addressing drugs, devices, and investigational items.

5. Representatives for university-sanctioned clinics will instruct vendors to deliver donated products to the Professional Education unit's Clinical Skills Laboratory. Once products have been delivered, the administrative head (a California-licensed veterinarian) will be notified and approve in writing a list of the products transferred to the representative for the university-sanctioned clinic. The representative will sign a dispensary log for the products transferred to the representative for the university-sanctioned clinic.

The Office of Development will be notified by the administrative head of the quantity and type of products donated so that the gift can be recorded and an official acknowledgment of the gift-in-kind is sent to the healthcare vendor.

The Office of Student Programs or the Office of Professional Education will record the name of the administrative head for each university-sanctioned clinic and update the list on annual or regular basis.

6. Student clubs arranging meetings with Healthcare Vendors must adhere to the Healthcare Vendor Policy, including implementation guidelines included in this document. Healthcare Vendors may not provide gifts to students, or provide food for an event, nor may they provide funding directly to any student club's off campus account. The vendor may, however, make a donation to the School of Veterinary Medicine, to be deposited into a University account for unrestricted gifts. Donations from all vendors will be deposited into this account, which will be managed by the SVM Office of Student Programs. An acknowledgement of the donations from all vendors, such as a banner with the names or logos of all donors, may be displayed at vendor events. In addition, a speaker may bring a banner, or some display showing the organization he or she represents.

7. Twenty-four (24) speaking opportunities per academic year will be opened up to HCVs to provide them a forum for interacting with SVM students. This policy is applicable to all HCV speaking engagements, regardless of topic discussed. HCVs and students must adhere to this policy whether the proposed discussion is educational or promotional in nature.

8. Speaker slots will be filled on a first come-first served basic, subject to a reasonable number per semester per Healthcare Vendor as defined by the Office of Student Programs.

9. Healthcare Vendors may purchase booth space at a university sponsored event.

10. Events such as those providing heartworm tests, micro-chips or other products for students' pets or for sale to pets with the proceeds going to students are not in compliance with policy and will not be allowed.

11. Exclusions from the definition of a gift are items provided at a discount or free as part of a research project, and prizes or awards from bona fide competitions.

B. Interaction between Healthcare Vendors and faculty, staff, and students

1. All Healthcare Vendors who present to the Veterinary Medical Teaching Hospital (VMTH) for the purpose of making a sales call or presentation to the Pharmacy or Central Service Unit, any clinical Service area, or a faculty member must have previously made an appointment with the individual Unit, Service, or faculty member.

2. Upon arrival at the VMTH the healthcare vendor representative(s) must sign the Healthcare Vendor Log located at the Large Animal or Small Animal Client Services reception area. A Client Service staff member will then contact the appropriate faculty or staff member to notify them that the vendor representative(s) has arrived for the scheduled meeting. A Client Service staff member will issue the vendor representative(s) a temporary badge and escort him or her to the appropriate area. Under no circumstances will a vendor be allowed to visit/meet with a Service area or clinician if a prior appointment has not been scheduled.

3. All healthcare vendors must sign out and return their temporary badge when their visit has been completed. Vendors may not enter patient care areas.

4. Healthcare vendors making presentations to students or student organizations are in compliance with University policy if the vendor does not provide food or gifts to students, and the presentation is made at the invitation of University personnel. All requests by healthcare vendors to make presentations to student groups and clubs are to be directed through SAVMA and must be approved by Office of Student Programs administrators. The number of healthcare vendor presentations is limited to a reasonable number determined by the Office of Student Programs per semester on campus. SAVMA will identify which healthcare vendor presentations will be scheduled for the respective semester, and will forward a written or electronic request to SVM Student Programs. Student Programs will then forward the approved request to the Office of Professional Education to schedule the room.

5. This policy applies to both on-campus and off-campus activities.

C. Continuing Education

Policies currently in place have been developed based on the Accrediting Council for Continuing Medical Education (ACCME) Standards for Commercial Support (https://www.accme.org/accreditation-rules/standards-for-commercial-support), and meet the requirements of the Healthcare Vendor Relations Policy. Below are the key provisions of the ACCME Standards, including interpretations pertinent to veterinary CE programs involving the School of Veterinary Medicine.

1. The following decisions are to be made by the SVM faculty:
   - Identification of CE needs

- Determination of educational objectives
- Selection and presentation of content
- Selection of all persons and organizations that will be in a position of control of the content
- Selection of educational method
- Evaluation of the activity

2. The CE provider (including program leaders) cannot be required by a commercial interest to accept advice or services concerning instructors, authors, or participants or other educational matters, including content, from a commercial interest as a condition of contributing funds or services.

3. The SVM will not accept "sponsorships" from commercial industry or other educational partners for continuing education programs; however, the SVM can accept *educational grants* that explicitly provide no "quid pro quo" relative to the topics or speakers:
   a. The terms, conditions and purposes of support from commercial sources will be documented in writing;
   b. Educational grants to support events, including meals or special presentations on specific products, can be accepted but must be clearly separated from the continuing education program in order to maintain independence of CE programs from commercial interests;
   c. Social events or meals will not compete with or take precedence over the continuing education activity;
   d. Honoraria and expenses will be paid by the SVM and are not to be sourced directly from a commercial or non-commercial educational partner; and,
   e. No payment, other than honoraria and reimbursement of out-of-pocket expenses, will be made to the director of the activity, planning committee, program leaders, speakers, authors or other University personnel involved in planning, organizing and conducting the CE program.

4. To serve as a Program Leader, the faculty or staff member must declare any relevant financial relationships with associated commercial interests within the previous 12 months.

5. Product-promotion material or product-specific advertisement must be kept separate from continuing education activities:
   a. No product-specific information is allowed in the syllabus or CE handouts
   b   No product-specific information is allowed in the room with the CE program

6. Disclosures

   a) To be provided to learners prior to the learning activity:
      1. All speakers and involved faculty are required to complete and sign a conflict-of-interest statement on which they can declare one of the following: *(1) no conflicts, (2) conflicts listed, or (3) decline to declare any conflicts.* These statements will be made available to all participants so that they can determine if any comments made by speakers and involved faculty may have been influenced by the conflict.
      2. A written conflict-of-interest statement from the producing organization (historically the Center for Continuing Professional Education) similar to that required of speakers.
   b) A written and signed declaration by the speaker committing them to identify any extra label use of drugs or medical devices described in his or her presentation
      1. A written release from the author must be on file for any written materials distributed as part of the program recognizing the author's ownership of his or her intellectual property and allowing the University to use the property limited to the specific program involved.

D. Purchasing Procedures

1. Purchasing decisions are made through the UCD campus purchasing unit, with multiple bids for major purchases, or a detailed justification for sole providers, as required by campus policy.
2. Pharmaceutical purchases are directed by the Chief Pharmacist, based on pricing and efficacy, with direction from the Product Evaluation or Pharmacy Committee, which includes two clinicians from the VMTH.
3. The SVM may not receive any pet food, free or at a discounted price, that is lower than the pricing available to other customers.

E. Pet Food Donations and Sales

1. SAVMA members and staff and faculty order pet food from manufacturers at a significant discount. The price paid by SAVMA members, and SVM staff and faculty for pet food is approximately 40% less than retail. This is acceptable under the Health Care Vendor policy as long as all pet food manufacturers have a chance to participate. There is no potential conflict of interest with respect to one manufacturer if all the manufacturers are providing discounted product.

2. The provision of free pet food products to the VMTH for use in feeding VMTH patients is prohibited by the policy. However, if all manufacturers are provided the same opportunity to participate, the VMTH could purchase the food at a discounted rate so long as the rate is reasonable. If the manufacturers wish to donate the fees from the purchased food back to the SVM or VMTH, they may do so if the donation is an unrestricted gift and there is no expectation of recognition to the vendors for their gift.

3. Therapeutic pet food is donated by pet food manufacturers to the VMTH Nutrition Services Support unit. This unit provides samples of the therapeutic pet food to patients and evaluates how the patient responds to the product. The client may purchase additional amounts of the food through the VMTH or from their regular veterinarian. This program also serves an educational purpose, as it allows SVM students to use the variety of therapeutic foods available for a specific purpose, as products vary from manufacturer to manufacturer. There is no policy prohibition with respect to the evaluation of the therapeutic pet food, and accepting these donations. This would fall under the definition of a permissible "sample" in the policy.

F. It is permissible under the Healthcare Vendors Relations Policy for vendors to employ student representatives.