

**College of Public Health and Health Professions  
Policy on Industry Academic Relations**

December 20, 2008

**Introduction**

The College of Public Health and Health Professions [PHHP] recognizes the value of an appropriate policy regarding interactions between the members of the College and industry and industry's representatives.

PHHP recognizes that there are legitimate and necessary interactions between members of the College (faculty, postdoctoral fellows, residents, interns, professional and graduate students and staff) and representatives of various healthcare industries. Support from industry for research, education and training programs as well as the offer of up-to-date information regarding new products or therapies can support the goals of the College and University.

PHHP recognizes the growing concerns in state and federal agencies regarding regulations or policies defining the boundaries of acceptable relationships between industry and academic healthcare as well as the need for ongoing monitoring of those relations. All PHHP policies will conform to and comply with current UF policies regarding outside employment and compensation.

PHHP's policies will apply to all members of the College – faculty, postdoctoral fellows, residents, interns, students, and staff. The Dean, or his/her designee, will monitor the ongoing implementation of policy and serve as the College's single, knowledgeable source to answer questions regarding conflict of interest as related to industry-academic relations. The Dean, or his/her designee, will work with the Office of the Senior Vice President for Health Affairs in its role to monitor such policies and their implementation across the HSC.

**The goal of this policy** is to assure that all members of the College are aware of their responsibilities with regard to industry relations and are obligated to understand and carry out the College and HSC policies pertaining to industry-academic relations and conflict of interest. To that end, all members of the College should understand how these policies relate to their roles and any implications for appropriate academic-industry interaction.

The Dean, or his/her designee, will maintain oversight of the implementation of the College's policies regarding academic-industry relations but will delegate to each Department Chair:

- (1) day-to-day responsibility of monitoring, within their own departments, adherence to the PHHP and HSC policies,
- (2) responsibility for bringing forward disclosure forms and/or notification of academic-industry interactions to the Dean's attention as needed, and

- (3) responsibility for seeking clarification of any questions regarding conflict of interest activities and/or policies.

### **Policies**

The College is committed to public disclosure and propriety in all its dealings with industry.

- a. **Service:** As healthcare providers, our primary responsibilities are to quality patient care and to adherence to HIPAA standards, Health Science Center and Shands patient care standards, and University and Health Science Center conflict of interest policies.
- b. **Science:** As scientists, our research must be free from any bias related to industry support including appropriate, documented safeguards as required by national and University policies.
- c. **Education & Training:** Within our education and training programs, if a particular company, vendor, or representative of industry wishes to support the educational mission of the College, including scholarships, that entity should place those funds in a central account within the College. That account will be monitored by the Dean and funds will be utilized as “unrestricted educational funds” in support of the mission of the College.
- d. **Continuing education support:** Industry support for continuing educational activities require full disclosure in accord the guidelines of the professional disciplines within the College.
- e. **Industry Access to Facilities:** Access to College facilities by industry representatives will be monitored by Department Chairs. Industry representatives must be accompanied by a faculty member during on-site activities, and those activities must be carried out in accord with HIPAA policies and regulations.
- f. When interactions between industry and members of the College occur, the boundaries of those interactions must be acknowledged and appropriately monitored.
  - i. **Consulting and travel:** Faculty consulting arrangements and industry supported travel will be monitored and reviewed by Department Chair and Dean according to the University’s guidelines on outside compensation.
  - ii. **Disclosure:** Full disclosure of industry support for faculty speaking outside the university is required and must be approved by Department Chair and Dean.

- iii. **Small Gifts:** Small gifts from industry to members of the College are not permitted. However, educational activities (e.g., symposia, seminars, luncheon lectures, etc.) may be supported through the College's unrestricted educational funds mechanism.
- iv. **Ghostwriting:** Industry has been known to ask faculty and trainees to put their name on papers for which the individual does not have total editorial control. Members of the College are prohibited from engaging in "ghost writing" arrangements with industry. College personnel should always be responsible for the content of any papers or talks that they give, including the content of slides.
- v. **Use of samples:** Faculty members may utilize test materials, equipment, etc offered as samples by industry only with Chair and Dean approval.
- vii. **Education of industry representatives:** Faculty members may be involved in providing education directly to members of industry with approval of Chair and Dean.
- vii. **Purchasing:** All purchasing activities will be based on the policies of the Health Science Center and University and monitored by Chairs as assigned by the Dean.
- g. **Acknowledgement:** When industry does directly support activities within the College, that support must be clearly acknowledged. A statement must be made noting that *"Acceptance of support does not constitute endorsement of this sponsor by the College of Public Health and Health Professions, its departments, or members of the College."*
- h. **Accountability:** Members of the College are accountable for their actions regarding this overall policy. Violations of College, Health Science Center, or University policies will be dealt with in accord with University policies on conflict of interest.
  - i. There will be a yearly orientation for all members of the College to the College, Health Science Center, and University conflict of interest policies via continuing education or as part of standing ethics courses; and
  - ii. Faculty will sign a yearly letter attesting to their knowledge of these policies and that they are not involved in any activities that would be considered as a conflict of interest with industry.