

Policy Number	UME.AC.118
Policy Title	Perelman School of Medicine (PSOM) Undergraduate Medical Education (UME) Student Conflict of Interest (COI) Policy
Effective Date	1/25/2024
Last Revision Date (if any)	N/A
Scope	PSOM UME Students
LCME Element(s) (if any)	

Perelman School of Medicine (PSOM) Undergraduate Medical Education (UME) Student Conflict of Interest (COI) Policy

Interaction between Students at the University of Pennsylvania Perelman School of Medicine and the Pharmaceutical, Commercial, Nutraceutical, and Biomedical Industry

I. PURPOSE

The purpose of this policy is to educate students on appropriate interactions between students in the UME environment at the PSOM with representatives of the pharmaceutical, nutraceutical, biomedical, and any commercial industry (including publisher, board review entity, etc.).

UME at PSOM is conducted in a variety of environments. Across this diverse spectrum of environments there are many opportunities for interactions between students and industry/commercial representatives. While many aspects of such may be positive, others may create a conflict of interest and potentially compromise the educational mission of PSOM. Medical education programs must have affiliation agreements in place that define the responsibilities of each party related to the educational program for medical students.

II. SCOPE

The policy is inclusive of the following interactions

1. Gifts and Meals
2. Consulting Relationships
3. Industry Sponsored Speakers
4. Disclosure
5. Pharmaceutical Samples
6. Industry Sales Representatives
7. Attendance at Industry-Sponsored Lectures & Meetings
8. Industry Support for Scholarships & Funds for Trainees
9. Disclosure Requirement in the School of Medicine Curriculum
10. Noncompliance

III. POLICY

Any interaction between any members involved with UME and representatives of the pharmaceutical/biomedical/commercial industry that may create COI must be disclosed and appropriately managed. Specifically, such interactions should support the core principles of professionalism as defined by the Association of American Medical Colleges (AAMC), namely: autonomy, objectivity, and altruism.

1. Gifts and Meals

- A. Students may not accept any gift or compensation from industry in any site in which UME occurs, including PSOM affiliated sites. Gifts and compensation are defined as anything of value that is provided to an individual, significant other, or a family member for which nothing of approximate value has been provided in return. Examples of prohibited gifts are as follows include the following:
1. Money, gift certificates, securities
 2. Support of travel or accommodations
 3. Free or discounted services
 4. Meals
 5. Free subscription to a commercial course

Exceptions to this policy include unrestricted educational grants which can only be provided to PSOM administrative offices for educational uses that promote the institutional mission.

- a. Students may not accept any gift or compensation for attendance at a presentation/talk by industry or commercial representative.
- b. Students must actively avoid the influence of industry in clinical care decisions (e.g. choice of drugs or other therapies).
- c. Students should also refer to the State Code of Ethics for further guidance. The following link is available to access this document: [PA State Code of Ethics](#)

2. Consulting Relationships

Students who are requested to provide a service or enter a contract should consult the [University of Pennsylvania Consulting and Outside Activities Policies and Procedures](#) for guidance and [contact the Chief Operating Officer of the Academic Programs Office](#) for further direction.

3. Industry Sponsored Speakers

- A. Industry may provide unrestricted educational support for educational sessions and events. However, in doing so industry is prohibited from influencing the choice of speaker or the education content. Participants should be made aware of industry sponsorship. The preferred mechanism of providing such support within PSOM is through an unrestricted grant to a Department, Center, or Program Director.
- B. Students may not accept honoraria from industry to speak at PSOM functions.
- C. Students may not book rooms for commercial entities. There can be no meetings or events on site to promote a Board Review course, IT product, or other commercial entity.

4. Disclosure

- A. Medical students may not publish under their own names articles that are written in whole or material part by Industry employees.
- B. If students have a financial interest that results in a scholarly publication, that interest must be disclosed in accordance with the International Committee of Medical Journal Editors (<http://www.icmje.org>).
- C. Faculty must ensure that their supervision of students is not encumbered by any actual, appearance of, or potential COI. Faculty are expected to comply with the medical school's annual COI reporting mechanism. If COI exists, faculty must appropriately disclose to students at the beginning of the educational activity and seek guidance on the management of their COI from the COO in the Academic Programs Office.

- D. For disclosure requirements related to educational activities, see the ACCME Standards for Commercial Support (www.accme.org).

5. Pharmaceutical Samples

- A. Sample medications cannot be distributed at PSOM by students. Samples may be distributed at affiliate sites and clinician offices at the discretion of the attending faculty.
- B. Free samples may not be sold or used by students for themselves, friends, or family.

6. Industry Sales Representatives

Medical students are not permitted to meet with sales representatives unless such encounters are supervised by faculty for teaching purposes.

7. Attendance at Industry-Sponsored Lectures & Meetings

- A. Programs must be aware of ACCME Standards for Commercial Support. These Standards are a useful resource for all forms of Industry interaction; those on campus and off, including events sponsored by the institution and others. The Standards may be found at www.accme.org.
- B. All education events sponsored by PSOM programs must be compliant with ACCME Standards for Commercial Support whether or not CME credit is awarded.
 - 1. Educational grants, particularly unrestricted grants, that are compliant with the ACCME Standards may be received from Industry by the program. ACCME guidelines include the following requirements:
 - a. Financial support by Industry must be disclosed by the meeting sponsor.
 - b. The meeting or lecture content must be dictated by the speaker and not the Industrial sponsor.
 - c. The information presented must be a fair and balanced assessment of therapeutic options and promote objective scientific and educational activities and discourse.
 - d. The selection of speakers or educational content by PSOM resident/fellow or teaching faculty must not be a condition of the industry sponsor's financial or material support.
- C. Food provided to students/residents/fellows may not be directly funded by Industry or any commercial entity. Industry is permitted to provide unrestricted educational funds to a Department, Center, Program Director, or designee on behalf of the program that may be used for refreshments at educational sessions. The contributing Industry(ies) can be credited for contributing an unrestricted educational grant for the session.
- D. This provision does not apply to meetings of professional societies that may receive partial Industry support for professional meetings governed by ACCME Standards.

On-Campus:

Students may not book rooms for commercial entities (see III above).

Off-Campus:

Students are encouraged to pay particularly heightened attention to the content and organization of such meetings and lectures and to assess the following issues when determining the academic value of any conference, lecture, or meeting:

- a. Disclosure of support and COI's for all speakers
- b. Oversight of the content
- c. Bias and balance
- d. Compensation, rewards, and gifts for attendees

8. Industry Support for Scholarships & Funds for Trainees

Any industry sponsored scholarship or trainee funding must be provided directly to PSOM. Such support must be unrestricted and free of oversight by the contributor, and it must be accompanied by a Letter of Agreement that is consistent with ACCME Standards for Commercial Support. The evaluation and selection of recipients of support is the sole responsibility of PSOM.

9. Disclosure Requirement in the PSOM Curriculum

Faculty must fully disclose any conflicts of interest related to their lectures and materials used in the educational setting by including a COI disclosure slide and/or relevant information in their syllabi.

All students must undergo training in COI with Industry. This training developed by PSOM is included in the Bioethics course curriculum.

10. Noncompliance

Where students are concerned, violation of this policy will be considered a breach of professionalism. Such violations should be reported to the Associate Dean for Student Affairs and Wellness, the Chief Operating Officer of the Academic Programs Office, and the Senior Vice Dean for Medical Education. Inadvertent violations provide an opportunity to educate the student and reinforce the importance of the policy. Repeated or deliberate violations must be referred to the Student Standards Committee and/or its Sub-Committee for Professionalism for consideration of sanctions.

IV. POLICY AUTHOR(S)

The Office of the Senior Vice Dean for Medical Education

The Policy Committee

V. REFERENCES

[ACCME Standards for Commercial Support](#)

[International Committee of Medical Journal Editors](#)

[PA State Code of Ethics](#)

[University of Pennsylvania Consulting and Outside Activities Policies and Procedures](#)

VI. GOVERNING BODY

Medical Faculty Senate

Undergraduate Medical Education Committee

VII. POLICY HISTORY

Date	Change
12/2023	Created
01/09/2024	Approved
01/25/2024	Effective