The pharmaceutical industry manufactures products that are indispensable for the treatment of mental disorders, yet there is concern within academia as a whole, and the Department specifically, about the interface between industry representatives and psychiatry residents. The issue at hand involves not only the possibility of bias, conflict of interest, or the appearance of quid pro quo prescribing practices due to the provision of gifts, meals, etc., but also the culture that the Department wishes to embrace with regards to the nature, frequency and quality of interactions between residents and industry. As ongoing contact with industry representatives will occur throughout a physician's career, the Department also recognizes that part of the Department's mission should be to provide residents with instruction and guidance on critically evaluating information provided by industry.

GUIDING PRINCIPLES

1. For-profit companies can only make a donation of resources that is not tied to any quid pro quo, such as an unrestricted educational gift.

2. In order to ensure that the gifts are truly for educational purposes (and therefore for the benefit of patients in the long run) and not a marketing interaction, the following conditions must be met:
   a. Gifts must be for the purpose of enhancing education or patient care.
   b. If the gifts are meant to *incidentally* enhance education (e.g., provision of meals), then they must be within the bounds of accepted community expectations, and must play a clearly enhancing role in the process of education or patient care.
   c. If the gift directly benefits education, then greater allowances can be made with respect to monetary value.
   d. The gifts must not be explicitly tied to any marketing activities directed at the residents.

3. Provisions should be made in the curriculum to help residents develop self-monitoring and skills to critically read literature gathered and presented under the sponsorship or funding of pharmaceutical companies, as well as to deal effectively with these conflicts of interest situations after they leave the program.

4. These policies and guidelines apply to all residents, fellows, and trainees in the Department of Psychiatry at UCSD.

POLICIES AND GUIDELINES

FOR RESIDENTS AND FELLOWS:
1. Residents may accept small items from industry (pens, etc.). Prominent displays of industry paraphernalia in clinical areas are discouraged.

2. Residents are discouraged from participation in purely social events (non-educational) sponsored by industry that are not co-sponsored by the Training Office or Department. Such purely social events lacking any educational component are currently prohibited under PhRMA guidelines.
3. Chief residents may obtain industry sponsorship for educational meetings after first ensuring that the meeting does not conflict with department educational or clinical activities.

FOR INDUSTRY REPRESENTATIVES:
1. Each industry representative should meet with the Training Director to receive a copy of these guidelines, or should receive these guidelines at the beginning of their tenure at each clinical facility where residents work.

2. The Department accepts industry-donated funds to support educational activities (such as sponsorship of visiting speakers for Grand Rounds), as well as funds donated to the Residency Training Office for purchase of textbooks or other needed educational items. Initiatives to benefit patients are especially encouraged.

3. Industry representatives are not permitted to discuss products in meetings but may be permitted to hand out peer-reviewed articles, package insert information, and patient educational materials at meetings.

4. Industry representatives should not page residents directly.

5. We do not allow distribution of materials by industry representatives to resident mailboxes.

6. Industry representatives (and head hunting firms) will not be given lists of our trainees under any circumstances.

FOR THE RESIDENCY TRAINING OFFICE:
1. The Training Office, in conjunction with the Executive Residency Education Committee, is to make the determination, on a merit basis, of which resident(s) will receive awards from the pharmaceutical industry to travel to professional meetings.

PERIODIC POLICY REVIEW:
These guidelines will be reviewed periodically in the Graduate Education Committee and departmental Executive Committee. These guidelines will be consistent with relevant guidelines issued by AMA, APA, PhRMA, the VAMC, the UCSDMC, and the Graduate Medical Education Committee, and modified periodically to follow their changes.

APPLICATION OF THE PRINCIPLES TO SPECIFIC PRACTICES

1. Grand Rounds and sponsored speaker luncheons.
   a. The speaker must be selected by the residents, the residency program, or the Grand Rounds Committee, and not exclusively by the pharmaceutical industry.
   b. If the speaker receives an honorarium or any kind of sponsorship from the pharmaceutical company, this must be disclosed. Grand Rounds speakers should be required to disclose any industry sponsorship/consultant roles at the beginning of their talk.
   c. Industry representatives must not be present when confidential patient materials are discussed, such as during Professor’s Rounds or Morbidity and Mortality Conferences

2. Ad hoc gifts to the residency program.
   a. The Training Director will decide whether to approve or disapprove the gift and/or its uses.
   b. The resources must be used to directly benefit residency education.

3. Travel awards.
   a. The Executive Residency Training Committee, without input from industry, will select the awardees.
   b. The meeting selected must be approved by the Committee. The Committee will employ the principles above in determining appropriateness of a meeting.

4. Ad hoc personal gifts to residents/trainees.
   a. Cash or cash-equivalent gifts are prohibited.
b. Coupons or gift certificates restricted to exchange for educational materials are permissible.

5. Drug samples. These are regulated under departmental policy that already applies to residents.

6. Prohibited activities.

   a. Entertainment outings with a nominal educational component where the primary inducement is entertainment and not education. The GEC or the RTO can make exceptions when a whole class or all residents will attend these events, and the events afford the opportunity for residents to interact with each other with the goal of enhancing residents’ morale and group cohesion. Examples include happy hours and residency retreats. It is anticipated that these exceptions will not number more than four to six per year.

7. Procedures for direct contact between industry representatives and residency program.

   a. Pharmaceutical representatives should make an appointment with the Training Director to discuss any offers of educational support to residents.

   b. The Training Director will consult with residents and the Graduate Education Committee as needed to make decision regarding gifts to the Program (see 2 above).

   c. Industry representatives must wait to see the faculty and chief resident in the general waiting area at UCSD Outpatient Psychiatric Clinic. They should check in at the reception desk. Individual doctors may prefer prescheduled appointments.

8. The residency curriculum will provide educational activities for the residents regarding conflicts of interest. This should be part of meeting the ACGME competency standards for residency education. The aim of this education is to provide a framework for professional behavior that will be used by the residents during residency and beyond.

   a. At least one lecture per year in the residents’ didactic curriculum should be devoted to conflicts of interest issues. This should address not only issues surrounding pharmaceutical industry gifts but also the potential effects of conflict of interest on health care resource allocation, on the generation and dissemination of psychiatric knowledge, and on the nature of the psychiatric profession.

References:

SMH Policy 12.1.1: "Sales representatives and vendors." http://intranet.urmc.rochester.edu/smh/policies/section12/12-1-1.doc


Acknowledgments:

The Committee is indebted to the University of Massachusetts and University of Rochester for their examples of policies regarding residency education, departmental activities, and the pharmaceutical industry.