

## **CHANGES TO THE UNIVERSITY OF ALABAMA AT BIRMINGHAM SCHOOL OF MEDICINE AND UAB HEALTH SYSTEM *GUIDELINES FOR RELATIONSHIPS WITH INDUSTRY* – April 14, 2011**

In March of 2009, the University of Alabama at Birmingham School of Medicine and the UAB Health System established *Guidelines for Relationships with Industry* that went into effect in July 2009. The *Guidelines* were intended to promote an environment of transparency between the institution and the community and to provide guiding principles for management of competing interests. These principles are in accord with our goal of continuing to provide patient care of the highest quality. The *Guidelines* were not intended to serve as a rigid or comprehensive code of conduct or to define absolute rules with respect to conflict of interest and interactions with industry. Rather, it was expected that implementation of the *Guidelines* would promote the highest levels of professionalism displayed by employees and trainees, and allow the leadership to manage competing interests with the flexibility that is sometimes needed in unusual or exceptional circumstances. They were also intended to be aligned with the spirit of the mission of the UAB School of Medicine: educating physicians and scientists in all of the disciplines of medicine and biomedical investigation for careers in practice, teaching and research; providing outstanding medical care and services; and enhancing new knowledge through clinical and basic biomedical research. Through an iterative dialogue on this complex subject, it is expected that a common school-wide goal of developing high professional standards will continue to evolve and, that these standards of professionalism will be embraced and practiced.

Because of the complexity of our relationships with industry and the real or perceived conflicts of interests in these interactions, a SOM Conflict of Interest Committee has been tasked to review our current *Guidelines for Relationships with Industry* and their implementation. **Based on the recommendations of this committee, and with the unanimous endorsement of the SOM Executive Committee, the following changes to our *Guidelines* have been adopted as of March 22, 2011 and will go into effect May 1, 2011.**

1. UAB AMC (UAB and HSF) employees and trainees are prohibited from participating in industry-sponsored, promotional Speakers' Bureaus. Speakers Bureaus are defined as industry sponsored promotional presentations which use materials provided to the speaker by the sponsor (eg approved slides) and have no CME offered.
2. Clinical faculty (formerly called voluntary faculty) are prohibited from using their UAB relationship in their relationships with Industry and cannot participate in Speakers Bureaus using their UAB appointment. When hosting trainees, these faculty must follow the UAB Guidelines that prohibit industry-sponsored lunches and using pharmaceutical samples dispensed by the office, not by a pharmacy.

### **RESPONSIBILITY FOR COMPLIANCE WITH SOM GUIDELINES**

The Senior Vice President and Dean of the School of Medicine expects the faculty to comply completely and promptly with all Policies and Guidelines of the School of Medicine, including *The Guidelines for Relationships with Industry* as well as the UAB requirements for requesting permission to participate in external activities, disclosing conflicts of interest, and/or disclosing conflicts of commitment. It is also the expectation that non-compliance will be managed by the Division Director and Department Chair and reported to the Dean's Office. Instances of non-compliance will be reviewed by a School of Medicine Compliance Committee, which in turn will make recommendations to the Senior Vice President and Dean for resolution of such cases.

In instances when the *Guidelines* have been deliberately breached, for example: failure to request permission to participate in external activities; failure to file or knowingly filing an incomplete, erroneous, or misleading disclosure form; participation in external activities that are prohibited; or other violations of the *Guidelines*, faculty will be sanctioned using a progressive disciplinary approach.

Possible sanctions will include the following:

1. Formal verbal or written admonition;
2. The inclusion in the employee's official personnel record a letter from the Office of the Dean indicating that the individual's good standing has been called into question;
3. Ineligibility to participate on clinical services, extramurally-funded research projects, grant application submission, Institutional Review Board (IRB) submissions or protocols, or supervision of trainees;
4. Non-renewal of appointment;
5. Dismissal from the School of Medicine.

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