

Summary of the policy on gift and industry interactions

- The policy applies to interactions between industry and employees, as well as employed and contracted physicians both on and off campus.
- “Industry” is defined as pharmaceutical, biotechnology, medical device and other healthcare-related entities.
- Voluntary physicians are covered on and off campus if they have faculty appointments or a connection to Northwell Health, such as committee memberships or contract relationships.
- Voluntary physicians are not covered off-campus if their contact with Northwell Health is limited to membership on the medical staff of a Northwell facility.

This document is a summary of the Gift-Interaction Policy. The complete policy and related materials are available from Corporate Compliance as well as our department page on our intranet.

We also have available:

- The complete Gift-Industry Interaction Policy
- Frequently Asked Questions for Interactions with Industry

For more information, call our compliance helpline at **(800) 894-3226** or visit **Northwell.ethicspoint.com**.

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Gift-Industry Interaction Policy

Policy #800.04

Purpose of the policy

In their various roles throughout Northwell Health, our staff, students, trainees, officers, trustees and other persons connected with the healthcare system interact with industry often and at different levels — from marketing and purchasing products, devices and supplies to pursuing education and research.

These interactions can support and enhance the work of Northwell Health, but must also be properly managed in order to avoid conflicts of interest, maintain patient safety and preserve the integrity of our programs. The purpose of this policy is to establish parameters for interactions with industry representatives for all staff, faculty, students, trainees and others connected with Northwell Health.

Gifts and food

- Personal gifts from industry such as notepads, pens, food, wine, entertainment tickets and flowers are prohibited on and off campus.
- Industry-provided meals at professional and similar meetings are permissible if the meal is provided in a manner consistent with Accreditation Council for Continuing Medical Education (ACCME) guidelines (e.g., no vendor involvement in planning the program or attendance, any food is incidental to the presentation, no sales materials).

Samples

- Drug samples at Article 28 sites (hospitals, clinics, etc.) must adhere to the policies of that facility's pharmacy.
- Elsewhere, drug samples should be used for patients only, for products that are needed quickly and/or are cost prohibitive.

Consultation and other outside engagements

- Outside engagements with industry, such as consultations and presentations, are permissible if (1) terms are in writing, (2) compensation is at fair market value and (3) the work reflects one's own views, has scientific merit and has been approved by the appropriate administrative director or chair.
- Industry-sponsored speaker's bureaus are prohibited unless academic investigators are presenting results of their research to peers and there is an opportunity for critical exchange.

Vendor relations: representatives, product evaluation, site visits

- Pharmaceutical sales and marketing representatives with new or compelling data may make an appointment with Northwell Health's chief pharmacy and medical safety officer or his/her designee or through the Office of Procurement. No other appointments are acceptable.
- Pharmaceutical medical liaisons (pharmaceutical company employees with advanced scientific or clinical degrees whose roles are to educate clinicians on scientific or medical advances), if credentialed with Northwell Health's vendor credentialing system, may have limited access by prior appointment.
- Medical device representatives may visit if the visit is related to the care of a patient and made by prior appointment. Industry representatives are permitted by invitation only and only in non-patient care areas unless to provide in-service education to clinicians. Industry representatives are permitted to interact with patients only by prior arrangement and only to provide patient education or assistance with the representative's products.

- No gifts provided by the representative, including food, are permitted.
- Students and trainees shall not interact with pharmaceutical medical liaisons and medical device representatives unless faculty members are present and only for educational purposes that include an exchange of views.
- Professional dress is required at all times. Scrubs must be worn only in authorized areas and must never be removed from the premises.
- Access is limited to non-academic and non-patient care areas unless reasonably required to access an appointment or for the education of a patient.
- Product samples provided by industry for evaluation have restrictions. Industry-paid site visits are prohibited. Consult procurement policies for more information.

Research

- Industry support for research is permitted with (1) a certification that the support will not influence purchasing decisions or research outcomes, (2) approval from the Senior VP, Research or designee, and (3) adherence to the policies of the Feinstein Institute and the Office of Grants and Contracts.

Industry support for Northwell Health projects

- Solicitation of industry support shall exclude industry marketing personnel and individuals with vendor or product recommendation roles to the extent practicable.
- Industry support shall not be payable to an individual, but to Northwell Health.
- Industry support shall be accompanied by a certification from industry that the support is being provided to further an educational or charitable purpose of Northwell Health and is not intended to influence purchasing decisions or research outcomes. Northwell Health, and not industry, will control the project, event or purpose implementation.
- Northwell Health shall follow the ACCME guidelines in managing industry's role, if any, in the project, event or purpose of the industry support.

Educational events

- All industry educational events sponsored by Northwell Health must be compliant with ACCME Standards for Commercial Support, regardless of whether or not CME credit is awarded, unless FDA-related or similar training is provided.
- Individuals may attend educational events not sponsored by Northwell Health only if (1) the event is offered by a professional society or academic institution and complies with ACCME Standards or (2) involves either training on the safe and effective use of a medical product and/or discusses non-promotional clinical educational information to further medical care.

