

Summary of the policy on gift and industry interactions

- This policy applies to industry interactions with all health system employees, trustees, students, trainees, residents, employed and contracted clinicians and voluntary physicians as applicable (referred to as “individuals”).
- “Industry” is defined as pharmaceutical, biotechnology, medical device and other healthcare-related entities.

Industry support for students or trainees

- Scholarship and fellowship support by industry is permitted, but must be by a written grant with the health system and placed in an account managed entirely by Northwell Health.
- An independent medical association or similar entity can provide scholarship and fellowship support directly to a student or trainee in accordance with a local, regional or national competitive or recognition process.

Industry product evaluations and site visits

- Industry products left for evaluation are permissible subject to approval by the Office of Procurement and require the issuance of a no-charge purchase order that describes the timeframes for evaluation, delivery and retrieval by the industry vendor.
- Industry support for travel by health system personnel to view products and equipment is prohibited.

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**.

Northwell Health
Corporate Compliance Office
1111 Marcus Ave, Suite 107
Lake Success, NY 11042
(516) 465-8097



Policy for vendors

Gifts and Interactions with Industry

Purpose of the policy

Northwell Health values proper relationships with its vendors. 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.

Relationship to industry codes of conduct

- Northwell Health acknowledges both the Code of Interactions with Healthcare Professionals developed by the Pharmaceutical Research and Manufacturers Association (PhRMA) and the Code of Ethics developed by the Advanced Medical Technology Association (AdvaMed).
- However, due to Northwell Health's role in education and research, our Gifts and Interactions with Industry Policy is more rigorous than the above industry codes. Industry representatives with questions may contact the health system's Office of Procurement at (516) 396-6410 or the Office of Compliance at (516) 465-8097.

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 provided by industry must adhere to the policies of that facility's pharmacy.
- Northwell Health's facilities generally either prohibit or severely restrict the use of drug samples.
- If drug samples are allowed by a facility, industry drug samples should be used for patients only, for products that are needed quickly and/or are cost prohibitive.

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.

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.
- Industry-provided, FDA-related training on the safe and effective operation of medical products may include modest meals and accommodations, but "lunch and learns" and similar engagements are not permissible.

Sales and marketing representatives

Access to Northwell Health premises by industry representatives is limited to the following:

- Pharmaceutical sales and marketing representatives with new or compelling data may make an appointment with the health system'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, including food, provided by the industry representative 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 needed to access an appointment or for the education of a patient.

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 a health system 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 shall follow the ACCME Standards in managing industry's role, if any, in the project, event or purpose of the industry support.

